

**Telecommunications Relay Service  
Application for Renewal of Current Certification  
State of Louisiana**

**Submitted to:**

Marlene H. Dortch  
Officer of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-B204  
Washington D.C. 20554

**Submitted by:**

Louisiana Relay Administration Board  
602 North 5<sup>th</sup> Street  
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Baton Rouge, LA 70802

**Provider of Service:**

**Hamilton Telephone Company**  
**d/b/a Hamilton Telecommunications**  
1001 Twelfth Street  
Aurora, NE 68818  
402/694-3656 TTY/Voice  
800/618-4781 Toll Free  
402/694-5037 Fax

August 29, 2007

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TW-B204  
Washington, DC 20554

Dear Ms. Dortch:

In reference to Public Notice released June 22, 2007, the Louisiana Relay Administration Board respectfully submits the attached application for renewal of the Louisiana Telecommunications Relay Service. Hamilton Telecommunications as contract operator of the Louisiana Relay system is providing services that meet all FCC minimum requirements, and all of the required information is included in the filing.

If any further information or clarification is needed we will be pleased to promptly provide the same.

Sincerely,

Larry Henning  
President of Louisiana Relay Administration Board

**TELECOMMUNICATIONS RELAY SERVICE  
APPLICATION FOR RENEWAL OF CURRENT STATE CERTIFICATION**

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# **Tab 1**

## **State Program Narrative**



**Louisiana**  
Relay

## Introduction

This is an application on behalf of the State of Louisiana submitted by the Louisiana Relay Administration Board to have the Louisiana Telecommunications Relay Service be certified as a Telecommunications Relay Service pursuant to the rules and procedures set forth by the Federal Communications Commission. The State of Louisiana has been certified for the last certification time period beginning July 26, 2003.

Official notices, documentation and correspondence related to this application should be directed to:

Mr. Larry Henning  
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Baton Rouge, LA 70810  
Voice: (225) 753-1531  
E-mail: [julia.thornton@centrytel.com](mailto:julia.thornton@centrytel.com)

Operational questions about the center may also be directed to the following:

Dixie Ziegler  
Vice President of Relay  
Hamilton Relay, Inc.  
1001 12th Street  
Aurora, NE 68818  
Voice/TTY: 402-694-3656  
Toll Free: 800-618-4781  
Fax: 402-694-5037  
E-mail: [dixie.ziegler@hamiltonrelay.com](mailto:dixie.ziegler@hamiltonrelay.com)  
Website: [www.hamiltonrelay.com](http://www.hamiltonrelay.com)

## **Request for Renewal of Current State Certification**

Wherefore, the Louisiana Relay Administration Board requests that the Federal Communications Commission certify the State of Louisiana Telecommunications Relay Service provided through Hamilton Telephone Company.

The Louisiana Relay Administration Board  
on behalf of the State of Louisiana

By: \_\_\_\_\_  
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## Tab 2

### Contract Status



**Louisiana**  
Relay

## **TRS Contract Status**

Hamilton Telephone Company d/b/a Hamilton Telecommunications is operating the Louisiana Relay Service under contract with the Louisiana Relay Administration Board. The term of the current contract is effective January 15, 2003 through January 14, 2006, with the option of two-2 year extensions, the first of which has been exercised.

Hamilton provides TRS service for the State of Louisiana from an in-state center located at 9107 Bluebonnet Centre Blvd., Baton Rouge, Louisiana.

The Louisiana Relay Service provides relay users with a complete relay service package which includes all features and services as listed in Appendix A of this filing, including a “self-learning” database that captures speed of equipment for each customer on the first initial call through the relay. Error Correcting software, Carrier of Choice, a variety of call types using VCO and HCO, a customer profile database and much more are part of the LRS’ relay package. Training for Communication Assistants is continual. Louisiana Relay also has developed an extensive outreach program for the State of Louisiana. The Outreach Team in Louisiana hosts user group meetings, focus group meetings, present relay information at conferences, attend and host organizational meetings and other related workshops for both hearing and non-hearing groups, give in-home demonstrations, answer questions and perform many other important outreach functions. For a complete list of the types of outreach activities Hamilton has completed, please refer to Appendix G.



## Tab 3

# Operational Standards



**Louisiana**  
Relay

## ***47 C.F.R. § 64.604 - Mandatory minimum standards.***

*The standards in this section are applicable December 18, 2000, except as stated in paragraphs (c)(2) and (c)(7) of this section.*

*(a) Operational standards—*

*(1) Communications Assistant (CA).*

- (i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.*
- (ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.*
- (iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.*

The Louisiana Relay Service requires Communication Assistants to be sufficiently trained to effectively meet the specialized communications needs of individuals who are deaf, hard of hearing, and speech impaired. Louisiana Relay Communication Assistants also have competent skills in typing, grammar, spelling, interpretation of type written American Sign Language, and familiarity with hearing and speech disability cultures, languages and etiquette. Before taking the first call, Communication Assistants are prepared to relay calls in a fashion that exceeds FCC standards. Below Louisiana Relay demonstrates how it hires and trains its CAs to meet the proficiency standards stated above.

The following exams are given to each applicant before hiring to ensure that the candidate has the needed skills to become a fully trained Communication Assistant:

- (1) Spelling test (must achieve at least 90% correct)
- (2) Reading skills (must be able to read clearly and distinctly)
- (3) Typing test

### **Spelling Skills**

The minimum spelling skills required of Louisiana Relay Communication Assistants is the ability to quickly and easily spell words that are equivalent to that of a beginning college level conversation. The spelling skills exam includes words that are a part of the 12th grade spelling level. Communication Assistants must pass a spelling exam to be eligible to work for Louisiana Relay. Following is a sample spelling test an applicant must pass before being hired as a Louisiana Relay Communication Assistant.

# Spelling Exam

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Circle the correct spelling.

- |     |              |               |              |
|-----|--------------|---------------|--------------|
| 1.  | COPERATION   | COOPERATION   | COPPERATION  |
| 2.  | REFFERRAL    | REFERAL       | REFERRAL     |
| 3.  | BUSNESS      | BUSINESS      | BUSSINESS    |
| 4.  | BROCHURE     | BROSHURE      | BROUCHURE    |
| 5.  | POSABLE      | POSSIBLE      | POSSABLE     |
| 6.  | INSURANCE    | ENSURANCE     | INSURENCE    |
| 7.  | SUBSCRIPTION | SUBSCTIPTTION | SUBSCRIPTION |
| 8.  | CATALOG      | CATILOG       | CATOLOG      |
| 9.  | CUSTOMER     | COSTAMER      | CUSTUMAR     |
| 10. | SUBMITTED    | SUBBMITTED    | SUBMITTED    |
| 11. | ANSER        | ANSWER        | ANSWUR       |
| 12. | ADDRESS      | ADDRES        | ADRES        |
| 13. | EXTINTION    | EXTENSION     | EXTENSIEN    |
| 14. | LITATURE     | LITERATURE    | LITERITURE   |
| 15. | RECEIVE      | RECIEVE       | RESEIVE      |
| 16. | SORCE        | SOURCE        | SOARCE       |
| 17. | INFORMATION  | INFORMATIEN   | INFORMATION  |
| 18. | PHYSICAL     | PFYSICAL      | PHISYCAL     |
| 19. | COMMITMENT   | COMMITTMENT   | COMITTMENT   |
| 20. | PRAIRE       | PRAIRIE       | PRARIE       |

## **Basic Skills in Reading, Speaking, and Writing English**

Louisiana Relay Communication Assistants must meet all necessary grammar proficiency requirements including reading, speaking, and writing English grammar prior to employment. Communication Assistants are required to demonstrate English grammar skills at a minimum of a 12th grade level. Louisiana Relay tests for these skills, diction, clear and articulate voice communications, and a neutral accent by requiring each prospective CA to complete the reading exam which follows:

### **Reading Exam**

There is a new wind blowing through the quality profession. It is bringing some very different messages to those of us who manage and support the quality functions of our organizations. These messages tell us about quality in ways that are hard to reconcile with our traditional understanding of quality. They are messages like "quality is customer satisfaction" or even "quality is customer delight"; "quality people do quality work" and "quality is the expression of human excellence."

We have difficulty with the messages because, as one quality professional noted, "I don't know how to develop specifications from these ways of thinking about quality. "It is a real dilemma because our history and technology have been built upon our ability to specify, measure, and control. As long as these specifications have been based on objectively measurable phenomena like length, weight, hardness, frequency, etc., we can set standards and develop control procedures based on these standards. Now we are confronted with a way of understanding that is expressed as customer satisfaction or even customer delight. How are we to translate this into specifications and standards?

### **Ability to TYPE at 60 wpm**

Louisiana Relay Service Communication Assistants must TYPE 60 words per minute.

**Louisiana Relay exceeds this service level by requiring CAs to maintain a 95% accuracy level in addition to 60-wpm typing.** Louisiana Relay has calculated average typing speed and accuracy in the Louisiana Relay Center. The Louisiana Center has an average typing speed of 68.48 wpm with 96.91% accuracy.

Louisiana Relay administers pre-hire tests to determine the typing speed and accuracy of each applicant. This testing procedure is designed to identify applicants who have the ability to reach 60 wpm with a 95 percent accuracy level within a three-week training period. Louisiana Relay CAs must pass an oral-to-text typing test at a 60-wpm level with 95 percent accuracy in order to take calls on the relay floor. Louisiana Relay subtracts all errors to calculate typing speed.

Louisiana Relay makes use of a computer based typing program for enhancing keyboarding, spelling and grammar skills. This is a program that Communication Assistants can enter at various levels and continue to progress and is a very effective method of self-improvement. Louisiana Relay has made computers and space available in all of our centers for Communication Assistants to use this software. Louisiana Relay also conducts regular typing tests. Louisiana Relay tests its CAs every four months in a manner which simulates actual working conditions to document current proficiency levels of the Communication Assistants and to make sure CAs are making progress over the term of their employment.

**Initial training:**

The training schedule used by Louisiana Relay can be found in Appendix B. A great deal of time is dedicated throughout the training process to instruct Communication Assistants on the proper phrasing of typed ASL “gloss” and grammar, tone of voice, hearing and speech disabled cultures, TTY etiquette, pertinent information about the needs of deaf, hard-of-hearing and speech impaired users, the role of the CA, and operation of relay telecommunications equipment including answering machines and computerized services. This is done through videos, training seminars with staff who are familiar with the deaf and speech disabled communities, observation, both simulated and live calls, and a variety of role play scenarios. Louisiana Relay CAs are well trained to effectively meet the specialized needs of hearing and speech-disabled individuals as explained below.

All newly hired employees undergo training in the areas of American Sign Language syntax and grammar, deaf/speech impaired culture, and ethics and confidentiality before considered a fully functional employee.

Louisiana Relay uses a variety of trainers throughout its training period. Louisiana Relay has a Training Coordinator who is responsible for the overall program. This person performs all classroom training and leads role-play activities. In addition, Louisiana Relay’s outreach employees and Communication Assistants all play a role in training. Outreach employees teach relay user culture while Communication Assistants share general knowledge about the relay and assist with role playing activities.

CAs are introduced to basic ASL training during the first three weeks of employment. The fundamentals of ASL training include in-depth information on the deaf syntax, culture, and basic limited signing.

In addition to basic training during new hire training, Louisiana Relay hosts several on-site classes throughout the career of each CA related to refreshing and expanding information learned in the initial training classes.

In order to become a STS CA, an individual must pass the same tests as traditional CAs, meet the strict STS criteria and pass an STS exam. Once a CA has been accepted into the STS Program, he/she receives specialized STS training.

During the training, STS CAs learn about speech disabilities and are given specific strategies to use in order to facilitate calls between STS users and end users. STS CAs also receive detailed training on STS policies and procedures. As follow-up to the initial training, the STS Program Supervisor continually educates all STS CAs on speech disabilities, their respective implications and etiquette, through the use of a STS newsletter, STS Resource Library materials (articles, books, videos, etc.), workshops, and in-service meetings.

Louisiana Relay Spanish Communication Assistants must complete the same training as all traditional Communication Assistants plus pass additional test showing proficiency in the Spanish language.

## **Interpretation of Typewritten ASL**

Louisiana Relay trains CAs to translate limited written English to correct spoken English via intensive training in three areas. First CAs are trained to gain an understanding of how communication impaired people write English and why. This includes syntax, abbreviations, etc. Louisiana Relay then instructs CAs on the proper ways to translate this form of English into correct written English. Finally, Louisiana Relay CAs are taught how to translate from limited written English to correct spoken English. By developing skills in these three areas and in this order Communication Assistant are much more capable of translating relay calls. Louisiana Relay uses videos, manuals, observation and a variety of role-play scenarios to practice these skills.

At the beginning of the training period, each Communication Assistant receives a manual covering syntax. This manual has proved to be a valuable tool for Communication Assistants as they develop their skills in this area. As a result of this manual and other types of classroom training, Louisiana Relay Communication Assistants are able to translate calls from limited written English language into English for the hearing party. Before relaying calls, Louisiana Relay CAs must pass a proficiency exam which tests the skills needed to meet this requirement.

In addition to the training described above, Louisiana Relay's relay provider has also developed an intensive translation program. This program was designed by a past President of the Registry of Interpreters for the Deaf and goes into great depth on how to perform translations from limited written English to correct spoken English and vice versa.

## **Proficiency Examinations**

Louisiana Relay Communication Assistants begin relaying calls at the end of the three-week training period if all proficiency skills are met including the fundamentals of ASL. Louisiana Relay uses several different testing mechanisms to ensure the highest quality standards in the industry. The exams measure skill levels in typing, spelling, dictation, relay procedures, including emergency call handling, characteristics of ASL as it may be reflected in the written language of TTY users, deaf, hard of hearing and speech disabled cultures, ethics and confidentiality, and professional judgement. Part of the exam process is performance based - the Communication Assistant must successfully complete several relay call scenarios. All other sections are quantifiable. Louisiana Relay can then determine that a Communication Assistant is meeting and exceeding all minimum FCC proficiency requirements. Tests are not available to CAs prior to testing (all tests are kept under lock and key) and portions of the tests are changed routinely. Any CA who cannot pass this examination within a three-month probationary period will not be utilized as a relay CA. CAs are tested on a variety of topics monthly to ensure that each CA continues to meet all requirements. Louisiana Relay retains all documentation of testing.

The performance-based testing used by Louisiana Relay consists of several relay tests calls. A variety of call scenarios is given to the CA to complete. Supervisors "grade" the CA on his/her ability to set-up the call, make appropriate billing arrangements, relay the call, typing and spelling accuracy, and overall proficiency of translating written ASL (when requested) and tone of voice. Various types of relay calls (i.e. VCO & HCO) are also tested.

During performance based testing Communication Assistants must demonstrate a clear understanding of deaf culture, ethics and confidentiality and professional judgement. These calls also test the CAs knowledge of relay procedures, conveyance of non-TTY and TTY user's tone of voice or expressive words.

### **CA Performance Monitoring to Ensure Each CA Continues to Meet all Requirements**

Through its relay provider's advanced relay platform, Louisiana Relay has established a unique "remote" call monitoring system. Louisiana Relay uses this call monitoring system to perform monthly evaluations. In Appendix E you will find the forms used to evaluate Communication Assistants. Such things as proficiency and professionalism, procedures, language, voice quality, decorum, and professional knowledge and skills are evaluated each month.

Louisiana Relay believes quality assurance is of the utmost importance. As a result, Louisiana Relay is constantly monitoring its Communication Assistants. Formal call evaluations are completed each month as well as informal "spot checking" every day to insure that Communication Assistants are performing properly on every call.

Monitoring staff are able to remotely monitor Communication Assistants so that the CA does not know when he/she is being monitored. Call monitoring can be performed at any time to ensure that all CAs are delivering high quality service on each call. Feedback is immediately given to each CA upon the completion of call monitoring.

Scores from the call monitoring are calculated and given to the CA so that progress and improvement can be tracked each month. In addition, a "center" report is generated that allows Louisiana Relay to monitor overall quality improvements. This system allows Louisiana Relay to set quality improvement goals for individuals as well as for the entire center.

Through call monitoring or as a result of poor test scores, any CA not in compliance with quality standards is pulled off the relay floor for further training and re-testing. These CAs are put on probation and monitored frequently to ensure continued improvement.

Quality measurements give Louisiana Relay an accurate picture of each Communication Assistant's skills as well as a record from which improvement plans can be built and future progress measured.

*(v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.*

**Louisiana Relay, as a matter of practice, does not change Communication Assistants during a call. Even at the end of shifts, over lunch hours, and other breaks, Louisiana Relay CAs stay with a call until it is completed. Our experience has been that this provides much greater continuity for the user.**

Louisiana Relay only substitutes a CA if the following should occur:

- **A caller requests a change in gender of the CA**  
Louisiana Relay Communication Assistants, when requested, will switch a call to another Communication Assistant who is of the gender requested by the caller and retain that gender for the user throughout the relay call.
- **Verbal abuse or obscenity is directed to the CA**  
If a relay user becomes abusive towards a CA (calling names, etc.) or does not give a number to dial, Louisiana Relay's procedure is to send a hot key requesting the number to call three times, waiting approximately 20 to 30 seconds between each time the hot key is sent. If the CA is still being harassed or is not given a number to dial, a supervisor is called. The supervisor will try to process the call. If abuse continues or there is no response, a disconnect slip will be completed.
- **The call requires a specialist (Spanish language, speech to speech, etc.)**
- **A perceived conflict of interest exists**
- **Or another major emergency exists**

A change never takes place until either the calling or called party has completed their part of the conversation (typed or stated GA).

If a call does need to be transferred, another CA replaces the CA relaying the call at the same workstation (using the same gender as requested), so that the relay user's call is not interrupted (except to identify the new CA to both parties). A supervisor monitors the change and must approve the change based on the criteria listed above.

Most relay centers have a common practice of substituting agents in the middle of calls to accommodate breaks, quitting times, etc. Louisiana Relay does not. Louisiana Relay is also willing to pay over-time for this type of service. **Louisiana Relay exceeds the FCC standard for substitution of Communication Assistants for TTY-based TRS, VRS calls and Speech to Speech TRS.**

*(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.*

Louisiana Relay Communication Assistants, when requested, will switch a call to another Communication Assistant who is of the gender requested by the caller and retain that gender for the user throughout the relay call. The identity of each CA is kept confidential.

If a call does need to be transferred, another CA will replace the CA relaying the call at the same workstation (using the gender as requested), so that the relay users' call is not interrupted (except to identify the new CA for both parties). A supervisor monitors and approves the change.

*(vii) TRS shall transmit conversations between TTY and voice callers in real time.*

Louisiana Relay transmits conversations between TTY and voice callers in real time. Louisiana Relay provides real time text to voice and voice to text calls in which a deaf, hard of hearing or speech disabled person utilizing a TTY or another form of text telephone can communicate over



the existing telecommunications network with a non-TTY user (and vice-versa) through the voice assistance of the relay service (Communication Assistant).

*(2) Confidentiality and conversation content.*

*(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.*

*(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.*

The Louisiana Relay Service Communication Assistants are prohibited from disclosing the content of any relayed conversation, regardless of the content, and from keeping records of the content of any conversation beyond the duration of a call. Communication Assistants are also prohibited from intentionally altering a relayed conversation. Louisiana Relay Communication Assistants type everything verbatim unless one of the relay users involved in the conversation requests summarization or translation. At this point in time, the CA gains permission from the other party involved in the call. If both parties agree to translation, the CA will then begin to translate the call. Relay users who always want translation, can select this option on the customer profile.

All Louisiana Relay STS CAs have the authority, at the request of the STS user, to retain information beyond the duration of a call in order to facilitate the completion of consecutive calls. Speech to Speech CAs are given the ability to keep records of the content of any conversation and retain information from a particular call in order to facilitate subsequent calls if requested. Speech to Speech CAs will also repeat any information (without the Speech to Speech user having to say the same thing each time) during subsequent calls if requested to do so. Speech to Speech CAs only retain this information for as long as it takes to complete the subsequent calls.

All Louisiana Relay Speech to Speech CAs are permitted to facilitate a call for a user with a speech disability if the user does not oppose the intervention. STS CAs do not interfere with the independence of the user; the user maintains complete control of the conversation.

## **Policies of Confidentiality**

Louisiana Relay's provider understands the importance and is experienced at relaying conversations promptly and accurately while maintaining the privacy of persons who use telecommunications relay services. All calls handled by the Louisiana Relay Service are totally confidential; no written or electronic script or record of any type is kept beyond the duration of the call. Louisiana Relay Communication Assistants and supervisory personnel understand that they shall not reveal information about any call, at anytime, regardless of content except the minimum necessary for billing purposes. All relay personnel are required to sign a Pledge of Confidentiality promising not to disclose the identity of any callers or fellow Communication Assistants or any information learned during the course of relaying calls during their period of employment as a Communication Assistant or after termination of employment. When relaying calls or analyzing data, Hamilton follows all confidentiality practices listed here.

Following is a general outline of some of the policies Louisiana Relay uses to preserve confidentiality:

1. All Communication Assistants are given thorough training on the significance and importance of maintaining confidentiality from both a legal perspective and a moral perspective.
2. Before being allowed in the relay service center and before taking any live calls, Communication Assistants are required to sign a Pledge of Confidentiality. (See Pledge of Confidentiality further in this section).
3. All Communication Assistants, prior to taking any live calls or being allowed in the relay center, are given a copy of Louisiana Relay's policies of confidentiality in addition to a copy of their signed Pledge of Confidentiality.
4. Louisiana Relay's policy requires immediate termination for any violation of confidentiality.

Louisiana Relay has additional protocols in place to prevent an unintentional disclosure of relayed conversations. The Communication Assistants' Procedure Handbook includes rules and regulations which must be followed to prevent any unintentional disclosure of confidential information. A whole section of this handbook is dedicated to the importance of confidentiality. From day one of the training program, Communication Assistants are taught how to work in a "confidential" environment.

The actual physical facility, in which the Communication Assistants perform their specialized duties, is located in a physically separated, private room, at the offices of Hamilton at 9107 Bluebonnet Centre Blvd., Baton Rouge, Louisiana 70809. The room is clearly marked prohibiting any unauthorized access.

### **Confidentiality During Training**

When training new Communication Assistants by sharing past experiences, trainers do not reveal any of the following information:

- (1) Names, genders, or ages of the parties involved in the call
- (2) Originating or terminating points of the call
- (3) Specifics of the information conveyed

**Discussion of Calls**

Louisiana Relay Communication Assistants understand that they shall not discuss, even amongst themselves or their supervisors, any names or specifics of any relay call except in instances of resolving complaints. Louisiana Relay Communication Assistants also understand that they may discuss the general situation surrounding a call with their supervisor in order to clarify how to handle a particular type of relay call and for that limited purpose only. Communication Assistants are trained to ask questions about procedures without revealing names or specific information that will identify callers. They are also trained to recognize emergency or life threatening situations and understand those circumstances in which the Communication Assistant may disclose names and specific information in order to expeditiously address the situation.

**Watching or Listening of Actual Calls**

No one is allowed to watch or listen to actual calls other than the Communication Assistant.

## **PLEDGE OF CONFIDENTIALITY**

I, the undersigned Relay Service Communication Assistant for the Relay Center, do hereby recognize the serious and confidential nature of this position and therefore promise in all good faith and conscience to abide by the following guidelines:

- 1) Under no circumstances will I disclose to an individual the identity of any caller or information I may learn about a caller while relaying his/her messages.
- 2) Under no circumstances will I act upon any information I may learn while relaying a call.
- 3) Under no circumstances will I disclose to anyone the names, schedules or personal information of any fellow Relay Service Communication Assistant or supervisor working at the Relay Center.
- 4) I will not share any information about a caller with any person with the exception of relay center supervisory personnel and then only to the extent necessary to resolve complaints, collect or clarify personal information necessary to provide and bill for relay services, such general information as may be necessary for the supervisor to assist in clarifying how to process a particular type of relay call, and such specific information as may be necessary for a supervisor to assist in expeditiously addressing an emergency situation.
- 5) In the event of my resignation or termination of my employment, I will continue to hold in strictest confidence all information related to the work I have performed as a Relay Service Communication Assistant.

Name (sign) \_\_\_\_\_

Name (print) \_\_\_\_\_

Date \_\_\_\_\_

## **Violation of Confidentiality**

Louisiana Relay's policy requires immediate termination for any violation of confidentiality.

Any of Louisiana Relay's Communication Assistants or supervisors who, after an investigation have been found to violate the confidentiality rules and regulations will be terminated immediately. If a consumer would allege a violation of confidentiality and the same was reported to the relay center or to the RAB in any manner, Louisiana Relay's policy would be to first investigate the alleged violation internally and make a written report both for the complaint file of the relay service as well as for the personnel file of the individual or individuals alleged to be involved. If a violation was found to have occurred those parties responsible for the violation would be terminated immediately.

### *(3) Types of calls.*

*(i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.*

*(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.*

*(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.*

Louisiana Relay does not and will not place any restrictions on the length or number of single or sequential calls placed by customers through the relay center. Louisiana Relay has never requested that a relay user finish early. Louisiana Relay will continue to manage its traffic loads in a manner which will not require it to ask customers to call back later under any circumstances.

Louisiana Relay is capable of processing non-coin-sent paid calls, sent-paid calls, collect calls, person-to-person calls, international calls, hotel calls and calls charged to a third party. Louisiana Relay also is able to process credit cards, any Louisiana local exchange calling cards and all non-proprietary interexchange company calling cards that are accessed by dialing an 800 number. This includes all major interexchange company calling cards. Relay users simply inform Louisiana Relay CAs when they want to use an alternate form of billing. The CA selects the correct billing method from an on-screen menu and the call is then placed. The customer's carrier of choice bills the call (based on conversation time) for intralata, interlata, and international calls.

## **Coin Sent Paid**

Louisiana Relay is capable of handling any call normally provided by common carriers with the exception of coin sent paid calls. Coin sent paid calls cannot be processed through the relay due to a lack of existing technology. The technology and networks between the common carrier network, payphones, and relay do not allow for signaling to be passed so that a Communication

Assistant can determine when coins have been dropped into the payphone. The FCC ordered that coin sent paid calls are not feasible.

Louisiana Relay does not charge relay users who want to place a local call from a payphone as stated in the current FCC coin-sent paid order.

Relay users making a long distance call from a payphone are able to use a calling card (debit card, regular calling card, etc.) or place a collect or third party call. The customer's carrier of choice then rates and bill any long distance payphone calls. Once billing has been established the call is processed as a regular relay call. In this manner, all relay users have access to anyone from a payphone.

### **Cellular/Wireless/PCS Phone Access**

Louisiana Relay is capable of processing relay calls that involve pagers, cellular and personal communications services. These services are all part of the Public Switched Network and they are handled just like any other relay call. The relay switch is compatible with the Public Switched Network. There is no difference in how voice or text initiated calls through relay are processed over wireless devices.

Louisiana Relay treats wireless call types just the same as any other call type and processes the call identically ensuring accurate billing by the wireless provider. Louisiana Relay has DTMF boxes at each workstation to perform dialing or access functions for relay users. DTMF boxes send tones that activate automated voice systems and pagers. Relay users can use wireless devices to call through relay including pagers. With DTMF capability, Louisiana Relay can navigate voice menus, answering machines, or any other automated system that either record or passes on voice, text, or electronic message to the other party even when using a wireless device.

The only time Louisiana Relay has experienced difficulty with wireless services is when a call originates from a non-feature group D office (that does not forward the correct ANI information). Although the majority of the time, this is not an issue, there are occasions when a wireless switch sends false ANI information on wireless calls and the CA needs to ask for an alternate form of billing.

For calls originating in areas where false ANI information is forwarded, Louisiana Relay's provider has developed an interim solution. The relay switch identifies wireless calls. When a wireless call has a false ANI associated with it, Louisiana Relay processes the call as "no bill" preventing the relay user from having to use alternate form of billing.

### **Directory Assistance**

Louisiana Relay gives all relay users access to local, intrastate and interstate directory assistance services via the relay and processes directory assistance requests in the same manner as any other relay requests.

Upon receiving the area code from the relay user, the CA dials the correct area code plus 555-1212. When reaching the directory assistance operator, the CA identifies the relay and asks for

the city and state the user has given while at the same time keeping the relay user informed. When the correct number has been obtained the call is handled as a regular relay call.

- **End User Billing for Directory Assistance**

The relay user can pick which carrier they want to use for directory assistance. The relay user's carrier of choice bills for interlata and intralata directory assistance calls at their tariffed rate. With intralata presubscription, all billing is performed by the customer's carrier. All directory assistance calls are sent to the customers' carrier of choice for processing and billing. Louisiana Relay does not set any rates for long distance or operator assisted calls since the customer's carrier of choice bills these calls. All directory assistance calls are billed via the customers long distance carrier.

**Louisiana Relay will continue to meet and adhere to all FCC requirements for all types of calls.**

## **Network Access**

Louisiana Relay provides functionally-equivalent network access for Louisiana Relay users. This includes access to local, intrastate (including intralata and interlata), interstate, and international call types.

Louisiana Relay's system provides for and serves all of the following types of calls. All trunks today are provisioned to be accessible from any jurisdiction.

- (1) Local calls originating and terminating within Louisiana, including EAS and optional calling plan calls
- (2) Intralata, interstate calls which are considered local calls – Billed to the TRS Interstate Fund (NECA)
- (3) Intralata calls originating and terminating within Louisiana
- (4) Intrastate, interlata calls originating and terminating in Louisiana
- (5) Interstate calls that originate within Louisiana and terminate outside of Louisiana - Billed to the TRS Interstate Fund (NECA)
- (6) Interstate calls that originate outside of Louisiana and terminate in Louisiana - Billed to the TRS Interstate Fund (NECA)
- (7) Interstate calls that originate outside of Louisiana and terminate outside of Louisiana - Billed to the TRS Interstate Fund (NECA)

Louisiana Relay 800 numbers, including 711, are able to place call types 1-7. Louisiana Relay's service is designed so that all calls made through its relay centers are billed from the originating telephone number to the terminating telephone number as if the call were made directly with no relay intervention. The relay platform includes necessary information about extended area service and optional calling plan arrangements in Louisiana so that calls made within an EAS area or optional calling area are not billed to the customer. ANI information appears at the workstation automatically and the terminating number is keyed in by the Communication Assistant so that a billing record can be created. For calls originating in areas where ANI information is not forwarded, Louisiana Relay Communication Assistants will key in originating number information.

Louisiana Relay does not charge users of Louisiana Relay for use of the relay service. Users access the relay service via toll-free 800 numbers, which are accessible anywhere in the United States or by dialing 711. Calling and called parties bear no charges for calls originating and terminating within the same toll-free local calling area, including all Extended Area Service (EAS) locations and/or local optional calling plan data.

### **Local and Intrastate Relay Calling**

Louisiana Relay provides local and intrastate calling to the users of Louisiana Relay and has obtained the necessary information (NPA/NXX) to build a database to identify the difference between local and intrastate calls (including expanded local information).

Louisiana Relay has contacted the LECs within Louisiana to collect all EAS and local optional calling plan information. Louisiana Relay has updated its database within its switching platform and its toll processing system to identify certain NPA-NXXs as toll-free calling areas. Relay users with access to optional calling plans are not billed any more for calls to the specific optional calling area than if they would have called directly through their local network.

The calling party's ANI is compared to the called number. The relay database used by Louisiana Relay determines if it is a local or intrastate toll call and gives the Communication Assistant notification if billing information is required. If it is a local call, no billing arrangements are necessary and there are no charges. If it is a toll call, Louisiana Relay sends the call to the customer's carrier of choice for billing purposes.

The entire call process and CA procedures used by Louisiana Relay are designed to make the relay center seem invisible. To the relay user, a call looks like it was placed from his or her primary location to the call destination. **Relay users do not see or get billed for the "links" going to and from the relay center. Relay users receive no billing for local calls. Intrastate/intralata calls are billed by the customer's carrier.**

### **Access to Regionally Directed Toll-Free Numbers**

Louisiana Relay allows access to regionally directed toll-free numbers. Because Louisiana Relay passes true Caller ID information, the caller's ANI reflect a Louisiana number which results in the call being routed to the correct state or regional location.

### **Access to Restricted Toll Free Numbers**

The service provided by Louisiana Relay allows access to restricted 800 numbers and other special prefixes. Louisiana Relay is providing this service today through an incumbent LEC via re-originating dial tone. Louisiana Relay makes sure that all of the relay users in Louisiana have access to all 800 numbers and other special prefixes.

### **Access to Businesses with Special Prefixes**

Louisiana Relay understands that some local telephone companies have abbreviated numbers available for services calls. Louisiana Relay will continue to work with Local Exchange Carriers to ensure proper routing and will allow Louisiana relay users to access businesses with special prefixes.



## **Relaying Interstate and International Long Distance Calls**

Louisiana Relay provides interstate and international calling to Louisiana relay users. As stated in the previous section, Louisiana Relay does not bill any long distance calls and thus is not in control of other carrier's discounts for relay calls. Louisiana Relay does provide to relay users a list of carriers available through the relay with customer service numbers so that a relay user can call any long distance company of their choosing to gather rate information, sign up for a relay discount, etc.

Following in this section is a complete description of how users are billed for long distance relay calls.

## **Inbound International Calls**

Louisiana Relay provides inbound International calling in which the relay user pays to place a call from an International location to the relay center. Louisiana Relay then places the outbound call to a destination in the United States free of charge and relays the conversation for them. All processed International calls are billed to the Interstate TRS Fund Administrator.

## **End User Billing for all Toll Calls**

Interlata (including interstate and international) and intralata long distance toll charges are recorded and billed by the relay users' carrier of choice in the same manner as the carrier bills that customer for direct interstate and intrastate long distance calls. On each interlata and intralata call, Louisiana Relay forwards the appropriate information digits, calling number and called number call as part of the call information so that the long distance company can bill the customer directly or through their normal billing mechanisms.

Louisiana Relay forwards information on each toll call to the relay user's carrier at the time the relay call actually takes place. The record contains: the originating and terminating numbers and the call type (e.g., person-to person, collect). Interlata and intralata billing records are created by the interexchange carrier as a result of the information digits and calling and called number data being sent to the interexchange carrier at the time the call is made. Long distance charges are based on the originating and terminating numbers. The location of the relay center does not affect billing. **The long distance carrier bills based on conversation time using their own rounding calculations. Louisiana Relay does not pass on session time to the carrier so only conversation time is billed by the carrier.** Billing and collection is then the responsibility of the interexchange carrier who carries the call.

The format of the bill for all toll calls are determined by the carrier as Louisiana Relay does not bill any relay calls. However, the call digit information will identify the call as a Louisiana TRS call and will further designate the type of call (i.e. 3rd number call, direct dial call, collect call, and person-to-person call). This allows carriers to correctly identify each relay call on their bill.

All billing to the relay user is based on minutes of conversation and is processed by the relay user's carrier of choice.

Louisiana Relay has the ability to place the following call types:

|                          |                               |
|--------------------------|-------------------------------|
| Bill to ANI              | Person to Person              |
| Third Party              | PP - Bill to ANI              |
| Collect                  | PP – Third Party              |
| Calling Card/Credit Card | PP – Collect                  |
| Prepaid Calling Cards    | PP – Calling Card/Credit Card |

### **Automated Billing System to Determine Call Jurisdiction**

Louisiana Relay makes use of an automated billing system to determine call jurisdiction. Louisiana Relay marks on every billing record whether the call is local, EAS, intrastate or interstate. This is done immediately when the call is placed. Louisiana Relay performs a second check of call jurisdiction during the monthly settlement process. In addition to redundant jurisdiction look-ups, Louisiana Relay also accounts for every minute of relay use. This means that all reports must balance at the end of every month in each jurisdiction category. This additional safeguard ensures that all minutes are accounted for correctly. Louisiana Relay bills the Interstate TRS Fund Administrator for all interstate minutes.

*(iv) Relay services shall be capable of handling pay-per-call calls.*

### **Pay-Per-Call Services**

Louisiana Relay allows relay users to access intrastate and interstate 800, 900 and 976 pay-per-call services in which the company providing the service bills the end-user directly. **Louisiana Relay has established the necessary trunking to the carriers participating in relay equal access so that the carrier can bill directly for this call.**

A relay user simply calls the TTY relay number and gives the 800, 900 or 976 number to the CA. The CA places the call as usual and begins relaying the call. On all 900 or 976 numbers, Louisiana Relay CAs type the dollar amount per minute associated with the call to the TTY user and asks him/her if he/she want to continue the call before charges begin. **This is the point in which callers can disconnect without being charged.** The calling party is billed for the call by the 900-service provider or the carrier, whichever is appropriate. Louisiana Relay's provider bills the Interstate TRS Fund and the RAB using the percentage split defined by the Interstate TRS Fund Administrator for 800, 900, and 976 calls.

Customers who do not want 976/900 calls made from their telephone line through the relay, can complete a customer profile form. The customer profile contains an option that will block 900 and 976 calls made through the relay. This prevents anyone from calling a 900 or 976 from that particular telephone line. If someone tries to call a 900 or 976 number through the relay from a line that has a block on it, the CA will receive notification at the workstation that this call is blocked and will not be able to place the call.

*(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.*

## **TTY/ASCII to Voice**

Louisiana Relay is able to accept a call from a TTY equipped caller, place a call to a hearing and voice capable caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link. Following is an explanation of how Louisiana Relay processes its TTY/ASCII relay calls.

Once the call is connected, the Communication Assistant sends a macro:

"LRS CA# \_\_\_\_ M/F number to call pls Q GA." The Communication Assistant dials the number requested and informs the TTY user of the status of the call via the keyboard (dialing, ringing, line busy, party not available, party available, explaining relay, etc.) If the called party has not received a relay call before and the TTY user has not requested otherwise, the Communication Assistant explains what relay is and how it works before beginning to relay the call. The TTY user then types the initial message, and the Communication Assistant verbally repeats this to the called party.

## **Voice to Text Call Processing**

Louisiana Relay is able to accept a call from a hearing and voice capable caller, place a call to TTY equipped caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link. Following is an explanation of how Louisiana Relay processes its Voice relay calls.

Louisiana Relay's Communication Assistant answers: "Louisiana Relay CA # \_\_\_\_\_. Number to call please." The Communication Assistant extends the call to the called number and informs the voice caller of the status of the call (dialing, ringing, line busy, party not available, party available, explaining relay, etc.). If the called party has not received a relay call before and the voice user has not requested otherwise, the Communication Assistant explains what relay is and how it works before beginning to relay the call. The voice caller then begins the initial message that the Communication Assistant types to the called party.

## **Voice Carryover (VCO)**

Voice Carryover (VCO) provides relay users with the ability to call to or receive a call from a voice-capable caller who is hearing-disabled permitting the caller to speak his or her own message directly to a call recipient who is hearing-capable without such transmission being processed by the CA. The CA then types any conversation spoken to the VCO user so it can be read on the TTY. Louisiana Relay allows relay users to request VCO services without the normal TTY transmission that is typically required. A VCO user can connect voice and say "VCO" and Louisiana Relay connects the call. **Voice users do not hear tones during a VCO call.**

Louisiana Relay allows VCO users to utilize both TTY modes, acoustic mode and direct connect mode. As discussed in detail further in this Tab, a variety of VCO call types are also available through Louisiana Relay.

The following is a comprehensive description of the method used to achieve this type of service.

A voice person receiving a call from a VCO user will experience the following:

“This is Louisiana Relay CA # \_\_\_\_\_ with a call from someone who may be deaf or hard of hearing and uses Voice Carry Over. Have you received a relay call before?”

At the same time, the CA will type to the VCO user the terminator’s greeting and gender (i.e. HELLO (M)).

If the voice party answers “Yes,”

The CA will VOICE: “Have you received a Voice Carry Over call before?”

If the party answers “Yes,”

The CA will VOICE: “One moment for your conversation to begin.”

If the party answers “No,” the CA will send a macro (EXPLAINING RELAY) to the VCO user and will voice: “The person calling you through the relay uses Voice Carry Over. You will hear the person speaking directly to you. When the caller says, “Go Ahead”, it is your turn to talk. Then I will simply type everything I hear on your end of the line, so please talk slowly and directly to your caller. Please say “Go Ahead” when you are finished speaking. One moment and you will hear your caller’s voice.”

## **Two-Line VCO**

Louisiana Relay provides **two-line VCO** capability which allows a VCO user to have a more interactive conversation. By using two telephone lines, the caller can listen to their conversation if they have some hearing available, on one line while receiving typed text from a CA on the other line, thus creating a more natural flow of conversation.

To place a two-line VCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the customer conferences in the third party (the party they want to speak with). Now, the CA only types what the third party says. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

### **Announcement:**

No announcement unless specifically requested.

### **Explanation:**

When voice party answers, the CA will type their greeting and gender to the 2LVCO user i.e. HELLO (M)

The CA will continue typing everything voice party says during the conversation. The CA does not use “GA” or wait for “GA” during the conversation. The CA types only what the Voice user says and DOES NOT type what the 2LVCO user says. May summarize if necessary.

## **Reverse Two-line VCO**

Louisiana Relay's Two-line VCO feature also works in the reverse when a voice user places a call to a two-line VCO user through relay. It is then called Reverse Two-line VCO.

## **VCO-TTY and TTY-VCO**

Louisiana Relay provides this service in which VCO users can call a TTY user (or vice versa) through the relay. The VCO user voices his/her conversation which the CA types to the TTY user. The TTY user types his/her conversation directly to the VCO user.

### **Announcement to TTY Terminator:**

The CA will type: LRS CA# \_\_\_\_ with a call from vco user (gender) ga

### **CONVERSATION BEGINS**

The VCO user voices his/her conversation which the CA types to the TTY user. The TTY user types his/her conversation directly to the VCO user.

### **Explanation to TTY Terminator:**

I will type your caller's conversation to you. You will type directly to them.

In addition, Louisiana Relay will provide VCO to TTY or ASCII services as well as all other combination of call types involving VCO.

## **VCO-VCO**

This service allows two VCO users to contact each other through the relay. Louisiana Relay provides VCO to VCO service where the CA types to both parties, preventing the VCO users from having to type their part of the conversation.

### **Announcement:**

The CA will type: "LRS CA# \_\_\_\_ with a call from vco user (gender) ga"

When the terminator requests VCO, the CA will connect VCO and type: "VCO on ga"

### **CONVERSATION BEGINS**

The CA will then type all conversation from the terminator to the originator and vice versa.

### **Explanation:**

"The person calling you is also using Voice Carry Over. I will type your voiced responses to each other."

## **Hearing Carryover (HCO)**

This feature allows relay users to place calls to or receive calls from a hearing-capable caller who is speech disabled permitting the caller to hear the communication directly from the call recipient without such transmission being processed by the CA. The CA then voices any conversation typed by the HCO user to the other party.

Louisiana Relay allows HCO users to utilize both TTY modes, acoustic mode and direct connect mode. As discussed in detail further in this Tab, a variety of HCO call types are also available through Louisiana relay.

A voice person receiving a call from an HCO user will experience the following:

“This is Louisiana Relay CA # \_\_\_\_\_ with a call from someone who may be speech disabled and uses Hearing Carry Over. Have you received a relay call before?”

If the party answers “Yes,”

The CA will VOICE: “Have you received a Hearing Carry Over call before?”

If the party answers, “Yes,”

The CA will VOICE: “One moment for your conversation to begin.”

If the party answers “No,”

The CA will VOICE: “The person calling you through the relay uses Hearing Carry Over. The caller can hear you and I will simply read your caller’s typed response to you. When I say, “Go Ahead”, it is your turn to talk. Please talk directly to your caller and say, “Go Ahead”, when you are finished speaking. One moment for your conversation to begin.”

## **Two-Line HCO**

Louisiana Relay provides **two-line HCO** capability. To place a two-line HCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the relay user conferences in the third party via the voice line (the party they want to speak with). Now, the CA only voices what the HCO user types. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

The CA will identify the call to the voice terminator using the language described in the previous section. If the voice party is not familiar, the CA will use the following explanation:

“The person calling you through the relay uses Hearing Carry Over. The caller can hear you and I will simply read your caller’s typed response to you. Please talk directly to your caller.”

## **HCO-TTY and TTY-HCO**

This feature allows HCO users to contact TTY users (or vice versa) via the relay. The CA will voice the TTY user’s typed conversation to the HCO user. The TTY user receives the HCO user’s typed conversation directly from the HCO user.

### **Announcement:**

The CA will type: “LRS CA# \_\_\_\_\_ with a call from hco user (gender) ga”

CONVERSATION BEGINS

The CA will voice the TTY user's typed conversation to the HCO user. The TTY user receives the HCO user's typed conversation directly from the HCO user.

**Explanation:**

"I will voice what you type to them. They will type directly to your TTY."

**HCO-HCO**

This service allows two HCO users to contact each other through the relay. Louisiana Relay provides HCO to HCO service where the CA voices to both parties, preventing the HCO users from having to read the other party's conversation. This is a great relay enhancement and Louisiana Relay is pleased to offer it to relay users.

**Announcement:**

The CA will type: LRS CA# \_\_\_\_ with a call from hco user (gender) ga

When the terminator requests HCO, the CA will connect HCO and voice: "HCO on ga"

CONVERSATION BEGINS

The CA will then voice all conversation from the terminator to the originator and vice versa.

**Explanation:**

"The person calling you is also using Hearing Carry Over. You will hear me as I read your typed responses to each other."

*(vi) TRS providers are required to provide the following features:*

*(1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.*

**TTY to TTY Call Release**

Louisiana Relay processes TTY to TTY calls when it is necessary to go through a voice switchboard first, or if the originating TTY user is using a calling card that is accessed by calling an 800 number first. Once the CA reaches a compatible TTY user when placing a relay call, Louisiana Relay gives the calling party the option to communicate independent of the relay function. The CA types to the terminating TTY user, "TTY TO TTY CALL ONE MOMENT PLS."

The CA then types to the originating party, "(CA HERE YOU ARE CONNECTED TTY TO TTY WHEN YOUR CALL IS FINISHED CALL BACK TO RELAY TO MAKE A RELAY CALL OR JUST HANG UP ONE MOMENT PLS)."

Once the CA sees the two TTY parties are able to read each other, the CA types, (CA HERE YOU MAY BEGIN YOUR CONVERSATION NOW) GA.

**The CA receives an automated message box with instructions to release the call from the workstation. Once the call has been released from the workstation, the CA is able to take any other incoming calls.**

Using the above procedure, Louisiana Relay provides a true call release function to satisfy the FCC requirement, which removes the workstation from the call. If the call is a long distance call, the call is billed as a normal relay call (i.e. the relay user's carrier of choice).

### **Voice to Voice Call Release**

Louisiana Relay provides Voice to Voice call release which allows a hearing user to connect to another hearing user via the Relay. This happening is usually inadvertent. Rather than blocking the call, this feature allows the CA to be "released" from the telephone line without triggering a disconnection between two hearing users. The CA releases the call after the CA connects the originating hearing caller to the hearing called party.

Once the CA hears the two hearing parties are able to communicate with each other, the CA states, "CA HERE YOU MAY BEGIN YOUR CONVERSATION NOW".

The CA receives an automated message box with instructions to release the call from the workstation. Once the call has been released from the workstation, the CA is able to take any other incoming calls.

Using the above procedure, Louisiana Relay provides a voice to voice call release function, which removes the workstation from the call. If the call is a long distance call, the call is billed as a normal relay call (i.e. the relay user's carrier of choice). Once the call has been released from the workstation, the call ceases to be a TRS call and is not subject to the per-minute charge to the State.

### **Speed dialing**

Louisiana Relay has developed a customer profile for relay users to indicate calling preferences. Customer profile information is presented to the CA each time the relay user calls the relay and includes the option of Speed Dialing. In the Speed Dialing section of the Customer Profile form, customers list the first name and phone number of people they call often through the relay. When a customer wants to call that person, they simply instruct the CA to call that person. There is no need to give the number to the CA.

### **Three-way calling**

In compliance with the FCC Order released on June 17, 2003, Louisiana Relay provides three-way calling capability, in which the customer (if the customer has purchased this feature from his/her LEC) can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center.

*(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain*



*them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.*

## **Machine Recording Capabilities**

Louisiana Relay has a recording function that allows the Communication Assistant to record a voice announcement and then play back the message at a speed controlled by the Communication Assistant. The CA informs the relay user through the use of a hot key on the CA's terminal that a recording has been reached, followed by another hot key stating (CA HERE WOULD YOU LIKE COMPLETE MSG TYPED OR HOLD FOR A DEPT OR LIVE PERSON Q).

If a caller requests a department or live person, the CA types, "HLDING FOR DEPT/PERSON" and presses the appropriate option when the recording prompts.

If a caller requests listening to the complete message, the CA sends a hot key that states, "COLLECTING INFO PLS HLD" and the CA continues to collect the recording.

The message is retained for the length of the call. This prevents the caller from having to call back several times to get the entire message. Once the originator of the call disconnects, the recording is automatically deleted from the system. Keys on the keyboard are used to control the speed of the recording ensuring the message is transmitted accurately by the CA. This makes the recording function very easy for Communication Assistants to use.

Whenever Louisiana Relay has to redial to an answering machine, voice mail, interactive voice messaging unit, or any other type of recording system, for whatever reason, Louisiana Relay does so without billing the customer for any subsequent long distance relay calls.

## **Answering Machine Procedures**

Communication Assistants are trained to relay recorded messages and leave recorded messages on telephone answering machines or hang up at the request of the caller.

Answering Machine procedures are as follows:

- Communication Assistant informs the relay calling party that an answering machine has been reached.
- The relay user can tell the Communication Assistant to simply leave a message if they do not want the Communication Assistant to type the entire recording. Otherwise, the Communication Assistant types the entire answering machine message. The Communication Assistant records messages and convey the message in its entirety.
- The CA asks the caller if they want to leave a message.
- If the calling party would like to leave a message, the Communication Assistant either voices or types the message onto the answering machine.

- Communication Assistant notifies the calling party that the message has been left.
- The relay customer is only be charged for the first call to the answering machine, if a toll call, regardless of the number of calls that may be required to retrieve and convey the answering machine message and/or to leave a message.

**If the relay user gives the CA directions of how they want the call handled, the CA follows the user's directions. The customer's directions always override established procedures.**

*(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.*

### **Answering Machine and Voice Mail Retrieval**

Communication Assistants are trained in retrieving and relaying TTY messages to voice users and voice messages to TTY users from voice processing systems. Communication Assistants use the following procedures to obtain messages for relay users:

1. The user is informed that the Communication Assistant has reached a voice processing system.
2. If the user requests message retrieval, Louisiana Relay obtains the appropriate access codes from the user. Louisiana Relay does not retain access codes or any other information needed to access a voice mail system subsequent to the call. ***This information is considered "call" information and just like any other call information, is kept totally confidential.***
3. After the voice processing system has been accessed, Louisiana Relay Communication Assistants begin to relay any messages that have been recorded or leave a message as requested. Louisiana Relay makes use of its advanced recording function to capture this information as discussed previously.
4. If the Communication Assistants must call again to finish relaying any messages, Louisiana Relay Communication Assistants do so without billing the end user for subsequent calls.

Louisiana Relay alerts relay users to the presence of a recorded message and/or interactive menu. Louisiana Relay uses hot keys (automated macros) to announce recordings or interactive messages. Louisiana Relay does not charge a relay user for subsequent calls to a recording or interactive messages.

### **Answering Machine Retrieval (Single-Line)**

Louisiana Relay provides this service in which messages from a voice or TTY answering machine or a single line telephone are retrieved by the CA. The caller requests Automatic Message Retrieval (AMR) or Single Line Answering Machine (SLAM) and plays the messages to the Communication Assistants by putting the handset near the speaker of the answering machine. The technology used by Louisiana Relay records any messages, enabling the Communication Assistants to capture the information and type or voice it back to the relay customer. Once the information is relayed to the caller and the call is completed, the recording is automatically erased when the caller disconnects.

*(4) Handling of emergency calls. Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.*

### **The Procedure used by Louisiana Relay for Handling Emergency Calls**

Louisiana Relay makes use of a national Emergency Call Relay Center, operated by Intrado, Inc., for the provision of handling emergency relay calls.

Louisiana Relay has had great success with Intrado and follows the procedures below:

- If the caller has the local emergency number which needs to be accessed, the call is promptly placed and handled in the same manner as any other relay call.
- In the event that the caller does not have the access number to 911 and the emergency appears to be of such a nature that time will not permit the caller to hang up and call directly to 911, the CA will contact the Emergency Call Relay Center (ECRC) which is accomplished through one stroke on the keyboard.
- Simultaneously, the CA obtains the address from which the person is calling from and selects the “emergency call” box option on the software at the workstation. (A Supervisor assists every 911 call. When a Communication Assistant makes this selection, a Supervisor is notified immediately as a flag indicator on the Supervisor Console is activated.)
- Once connected to the ECRC, the CA will identify as a TTY relay call and relay the location of the caller. (If the CA does not obtain location information, the CA gives the ECRC the ANI of the caller.)
- The ECRC immediately transfers the call to the appropriate PSAP center. The ECRC drops off the call once confirming that both parties are on the line and the correct PSAP has been reached. The CA processes the call as normal.
- Louisiana Relay passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.

### **Back-up Emergency Procedures**

- As a back-up to Intrado in the event that Intrado is unable to match the caller with the appropriate PSAP, Louisiana Relay has procedures in place to access its own emergency database.
- The software used by Louisiana Relay takes the NPA/NXX information from the ANI of an incoming call and matches it to information in its database. The ANI indicates what city or location a call is coming from. This NPA/NXX information is then cross-referenced to a list of towns and locations in the State of Louisiana stored in the database. Louisiana Relay has mapped each NPA/NXX in Louisiana to the appropriate PSAP. Once this search is complete

(it only takes a second) the correct emergency telephone number is loaded automatically into the "outdial" box and the Communication Assistant can immediately dial the appropriate emergency personnel. This process ensures that Louisiana Relay users have access to the correct and appropriate PSAP when their call is handled in any Hamilton facility.

- Louisiana Relay passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.
- If the caller is using a cellular phone, the ANI is not a good indication of where the caller is actually calling from. In this case, the CA asks for the nearest city name and initiates an automated search for the appropriate PSAP. If several PSAPs are listed for the same city, the CA will try to identify the correct one with a quick question to the caller.
- Louisiana Relay's emergency database application described above meets the new requirements established by the FCC.

### **FCC Rules for Emergency Calls**

In the June 2004 order, the FCC adopted the definition of "appropriate" PSAP as "either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner." The database used by Louisiana Relay automatically and immediately transfers the caller to the appropriate Public Safety Answering Point based on NPA/NXX information.

The key to providing the best service in emergency situations is to maintain an updated list of Public Emergency Service Answering Point numbers (i.e. 911 centers). Louisiana Relay accomplishes this through two mechanisms to ensure that relay users are connected to the appropriate PSAP: 1) through the use of Intrado's 9-1-1 infrastructure and 2) through the PSAP database maintained by Louisiana Relay's provider.

### **TTY to TTY Communications Between PSAP and Caller**

Louisiana Relay will process direct TTY to TTY communications between the PSAP and the TTY caller.

### **If a Caller Disconnects Before Being Connected to the PSAP**

In the event that a caller disconnects before being connected to the PSAP even if the CA is unable to get the number of the caller before the call is disconnected, the workstation contains a notification feature that initiates a command to write a record of the ANI calling for emergency assistance. The Supervisor can then access this information if needed, so no matter when the caller hangs up, Louisiana Relay can send the correct ANI information to the 911 center.

The Supervisor will contact the appropriate 911 center and give the dispatcher any pertinent information collected on the call. This includes ANI for the caller so that if the 911 center has "Enhanced 911 Services", emergency personnel will be able to locate where the person in need is calling from.

Louisiana Relay is not intending to be a 911 center; however, as stated above we will not turn away an emergency situation and Louisiana Relay will take all reasonable steps possible to get the call placed and summon any necessary help. During the course of any such calls, the CA continually attempts to solicit as much information as possible about the nature of the emergency so that in the event that the caller cannot complete the call for any reason, the CA may have an opportunity to seek out the appropriate emergency assistance. The CA then gives the dispatcher any pertinent information collected on the call even if the originator of the call has disconnected. This includes ANI for the caller so that if the 911 center has “Enhanced 911 Services”, emergency personnel will be able to locate where the person in need is calling from. This meets the FCC’s new requirement where a CA must pass along the caller’s telephone number to the Public Service Answering Point (PSAP) when a caller disconnects before being connected to emergency services. This allows the PSAP to follow their regular procedures, which is to call back the person calling for help. If time allows, the CA will let the relay user give this information to the dispatcher through normal call practices.

**The emergency call plan used by Louisiana Relay follows this section. This covers the scenario of a relay user disconnecting before the call is completed.** If the 911 call is completed, the CA will follow normal relay procedures with the assistance of a supervisor and the caller’s ANI is transferred to the appropriate PSAP as described above.

# 911 Procedures

## **If the caller disconnects before the emergency call to the PSAP is completed:**

Call the 911 Dispatch number that is listed in the Emergencyfile.txt or the emergency dispatch numbers file ASAP (all of this is immediately available on the CA's workstation screen). Remember this is a 911 call.

When you reach the 911 dispatch operator use the following steps:

- A. **Greeting:** This is "CA XXXX" from "State" Relay Center. We just received a 911 call that wasn't completed. The caller uses a TTY and may be Hard of Hearing, Speech Disabled, or Deaf. The ANI is XXX-XXX-XXXX.
- B. Ask the 911 dispatch operator if they have a TTY. If they do not proceed to item "C". Ask if they know how to use the TTY. If they don't know how to use the TTY proceed to item "C". If they know how to use the TTY proceed to item "E".
- C. Give the 911 dispatch operator the Voice relay number for the correct state.
  - 1. LA 800-947-5277
  - 2. WI 800-947-6644
  - 3. KY 800-648-6057
  - 4. NE 800-833-0920
  - 5. ID 800-377-1363
  - 6. RI 800-745-6575
  - 7. ME 800-457-1220
  - 8. WY: 800-877-9975
  - 9. IA: 800-735-2943
  - 10. MT: 866-253-4090
  - 11. GA: 800-255-0135
  - 12. WV 800-982-8772
  - 13. AZ 800-842-4681
  - 14. KS 800-766-3777
  - 15. MD 800-201-7165
  - 16. Saipan: 866-339-9384
  - 17. Virgin Islands: 800-809-8477
- D. Ask the 911 dispatch operator if they know how to use the relay. If yes proceed to item "E".
  - 1. Relay Explanation  
The person you are calling through relay will be typing their conversation and the CA will read it to you.
- E. Ask the 911 dispatch operator for their name or operator number. Record this information on the CA's Emergency Call Slip.

Complete the Supervisor Emergency Call Slip in the Emergency Dispatch Numbers folder.

**Louisiana Relay currently handles emergency calls as expeditiously and effectively as possible even though the center is not designed to be a substitute for 911 centers.**

Through its outreach programs and outreach materials, Louisiana Relay educates relay users about how to use 911 services. As a part of this information, Louisiana Relay encourages relay users to call 911 direct and to contact their local emergency service personnel using a TTY to ensure that the 911 center will process a TTY call correctly if there ever were an actual emergency.

In addition, Louisiana Relay gives presentations to 911 centers routinely as part of its outreach program. Louisiana Relay provides training and other assistance to emergency dispatchers to ensure TTY calls or relay calls are handled correctly.

*(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.*

## **Speech to Speech**

STS service allows individuals with a speech disability to use his/her own voice or a speech synthesizer when using the relay. STS users are able to communicate with any and all relay users including but not limited to VCO, HCO, TTY, 2LVCO, other STS users or standard phone users. Specially trained CAs process Speech to Speech calls. STS is also available in Spanish.

Louisiana Relay's provision of Speech to Speech meets all FCC requirements for Speech to Speech call processing.

Prior to all outgoing calls, STS CAs verify the number for accuracy and then repeat the number when dialing out. This verification process is repeated for all busy numbers after dialing out and receiving a busy signal.

STS CAs are permitted to facilitate a call for a user with a speech disability if the user does not oppose the intervention as required by the FCC. STS CAs do not interfere with the independence of the user; the user maintains complete control of the conversation. The STS CA may retain information only for subsequent calls.

Louisiana Relay provides STS users the same profile and all of the features contained within that profile which are currently available to other relay users. **Louisiana Relay has a feature, which allows all relay users, including STS users, to maintain a list of names and telephone numbers. A relay user simply gives the name of the person to call to the CA, the CA repeats the name and state the number of the person to call. The Speed Dial feature is of great benefit to STS users.**

Louisiana Relay complies with the 15-minute requirement prior to changing STS CAs. STS CAs understand the difficulties involved in changing CAs and only request a relief under emergency

circumstances. A Supervisor must approve and facilitate a STS CA change. Louisiana Relay STS CAs truly care about STS consumers and are willing to stay with a call until completion even at the end of a shift, at lunch time or break time. Louisiana Relay exceeds the FCC standard for substitution of STS CAs.

If a change in STS CA is necessary, another CA will replace the CA relaying the call at the same workstation so that the relay user's call is not interrupted except to identify the new CA to both parties. The replacement STS CA will announce, "This is CA# \_\_\_\_ continuing your call." A supervisor monitors the change and must approve the change based on the caller's request or emergency circumstances.

All STS CAs have the authority, at the request of the STS user, to retain information beyond the duration of a call in order to facilitate the completion of consecutive calls. This information is retained only for the duration of the inbound call. STS CAs retain any important information given by the STS user which might be difficult for the STS relay user to repeat (i.e. credit card numbers, telephone numbers, account numbers, etc.) for use in a subsequent outbound call. Louisiana Relay places a great emphasis on maintaining the confidentiality of relay users. As a result, all information is destroyed immediately upon termination of the inbound call. The above meets all FCC requirements for Speech to Speech call processing.

With a staff of highly trained STS CAs, Louisiana Relay provides the best service possible to an emerging group of relay users.



## Tab 4

# Technical Standards



*(b) Technical standards.*

*(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.*

Louisiana Relay Service is capable of receiving and transmitting using Voice, Turbo Code, ASCII or Baudot formats, at any speed generally in use. All equipment is compatible with industry-wide standards. The modems used by LRS can auto-detect the difference between ASCII and Baudot signals within the same modem so that each call is connected correctly. LRS furnishes all necessary telecommunications equipment and software to be capable of communicating with all voice, Baudot and ASCII calls at the correct Baud rate. The workstations and switching mechanisms used by LRS are flexible enough to process other formats as they become available to relay users.

The Louisiana Relay Service provides Turbo Code, a proprietary alternate protocol developed by Ultratec which allows faster typing speeds and interrupt capability. This alternative protocol is discussed in detail in Appendix A.

*(2) Speed of answer.*

*(i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.*

*(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.*

*(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.*

*(B) Abandoned calls shall be included in the speed-of-answer calculation.*

*(C) A TRS provider's compliance with this rule shall be measured on a daily basis.*

*(D) The system shall be designed to a P.01 standard.*

*(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.*

Louisiana's Relay Service provides adequate staffing to provide callers with efficient access to the relay. The probability of a busy response due to Communication Assistant unavailability is functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Except during network failure, LRS **answers** ninety percent (90%) of all calls within 10 seconds, on a daily basis and (95%) of all calls within 10 seconds, on a monthly basis, all measurements include abandoned calls. This results in the caller's call immediately being placed, not put in a queue or on hold on a daily basis for the State of Louisiana. LRS begins measuring Average Answer time from the moment a relay call arrives at its relay switch (i.e. in the TRS center's network). As soon as the equipment used by LRS accepts the call from the LEC and the public switched network delivers the call to the TRS center, LRS starts its call detail record to capture answer time data.

The State of Louisiana has contract provisions in place to assess its relay provider liquidated damages if these answer seconds are not maintained. Hamilton is meeting this standard today for the State of Louisiana.

### **Call Blockage**

The LRS is designed to a P.01 standard. No more than one call in 100 will receive a busy signal when calling the relay center at the busiest hour. LRS defines "blockage" as any call that arrives at the relay switch but is not answered due to the customer receiving a busy signal.

**There has been no blockage at our switch points because our incoming network capacity is well in excess of any peak load requirements.** Relay users never receive a busy signal from LRS. If a relay user does reach a busy signal, there is a problem somewhere else in the network that is not under LRS' control (i.e. local network, long distance network, equipment, etc.)

Although very unlikely, in the event the switch used by LRS is down, calls are automatically rerouted or intercept messages are used rather than busy signals.

The systems used by LRS are designed to prevent blockage. The switch used by LRS is a high-speed, stand-alone, **non-blocking** digital switching matrix. The system is fully redundant to insure quality and reliable performance, making blockage or any downtime nearly impossible. The system auto-detects any problems and moves to the secondary system immediately if necessary.

Another measure LRS has taken to prevent blocking is to use networks that make use of SONET survivability technology. All of the networks controlled by LRS - from the point a relay user picks up the phone in their home or business, through the relay and then back to the other phone being called - are redundant and can survive fiber cuts and other such outages. This allows LRS to maintain its zero percent blockage rate.

LRS measures, records and reports its answer performance and blockage rate information to the RAB and abides by the FCC rules (i.e. a LEC shall provide the call attempt and the rates of calls blocked between the LEC and the relay center upon request).

Hamilton's transmission circuits meet or exceed industry interexchange performance standards for circuit loss and noise. Hamilton has no busies at its center because of a lack of facilities. Hamilton's system is currently provisioned in such a manner that call blockage or busies never happen. This meets the FCC requirements. **In the last 12 months Hamilton has experienced absolutely no call blockage.**

*(3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.*

LRS provides relay users with access to the interexchange carrier of their choice through the TRS, and to all other operator services, to the same extent that such access is provided to voice users. Interlata and intralata long distance toll charges are recorded and billed by the relay user's carrier of choice in the same manner as the carrier bills that customer for long distance calls made without the relay. On each interlata and intralata call, LRS forwards the appropriate information digits (identifying the call as a relay call), calling number and called number as part of the call information so that the long distance company can bill the customer at correct functionally equivalent rate through their normal billing mechanisms. Calling card or credit card billing is handled in the same manner. LRS has provisioned the necessary trunks at each of its relay switching tandems for all long distance companies participating in equal access so that they can receive LRS relay traffic. LRS offers equal access to all carriers who choose to participate.

When a call has been defined as a long distance call, LRS sends this call to its relay switching tandem. The correct carrier code is sent with each call so that the tandem sends the call to the customer's carrier. Each call is identified as a relay call. If a relay user has signed up with his/her carrier of choice for a "relay" discount, the carrier will bill the call as a relay call and pass on any discounts. Relay users will receive one bill from their carrier of choice just like they do for all of their direct calls. LRS explains this type of billing arrangement through all Outreach and Customer Service activities, in newsletters, relay materials, etc. so that relay users understand how to select a carrier and find the best long distance rates.

LRS provides relay users with access to all other Operator Services to the same extent that such access is provided to voice users. Operator services are handled in the same manner as explained above. All operator assisted calls are sent to the customers' carrier of choice for processing and billing.

The type of arrangement explained above gives the control to the relay user. The relay user can pick their carrier of choice, receive one bill for all of their calls, and the relay user can shop for the best rates, just like they do today for calls not made through the relay. The relay user can continue to work with one carrier and the relay remains invisible.

The customer profile program used by LRS is based on the relay users' ANI that provides automatic connection to the carrier of choice for both interlata and intralata calls made by the relay user. Relay users complete a customer profile with their carrier information and LRS adds this information to its database. On each subsequent relay call relay users are automatically connected to their carrier of choice. Relay users can also notify the Communication Assistant of

their carrier of choice when making a long distance relay call. In the event a relay user elects to change his/her carrier of choice, the Communication Assistant is able to do so. The Communication Assistant will also explain carrier of choice to a relay user when asked.

LRS offers 1010 dialing through the relay. This service is functionally equivalent to using 1010 services when not placing calls through the relay. In addition to 1010 dial-around, LRS has 30 interexchange carriers available on its platform.

In order to obtain new carriers on its platform, LRS contacts all carriers that are requested by Louisiana relay users to see if they will participate in relay equal access. LRS then works diligently through ordering and testing phases with that carrier to ensure that the carrier becomes available to Louisiana relay users. Hamilton maintains a list of participating long distance carriers for the Louisiana Relay Service and makes this information available to relay users.

#### *(4) TRS facilities.*

*(i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.*

The Louisiana Relay Service provides telecommunications relay service 24 hours a day, 7 days a week.

*(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.*

The facility used by LRS has the needed redundancy in switching mechanisms and telecommunication facilities to ensure operation 24 hours a day. LRS is operated from an in-state center located in Baton Rouge, Louisiana. LRS calls automatically overflow during peak volume times and during any failure of switching or telecommunications facilities to other centers operated by the LRS relay provider. This ensures continuous operation of the LRS.

### **Switching System**

LRS makes use of an Excel telecommunications switch. The GS-2000 is a programmable, non-blocking switching system that supports a wide range of digital telephony services. Its open, modular architecture and programmable interfaces allow for simplified and cost-effective application development. The GS-2000 supports up to 2,048 ports in a single high-density system. Its components include a matrix CPU, network interface cards, Digital Signal Processing service cards and SS7 packet engine cards. The GS-2000 adapts to all standard network and line interfaces, including T1, E1, J1, and ISDN PRI.

The InterCall Switch Operating System (ISOS) was developed in response to the need to quickly develop applications on the Excel Inc. programmable switching platforms.

The ISOS can simply be loaded on a UNIX host, and plugged into the switch to offer basic tandem type switching capabilities including routing and call detail records. The ISOS is a fully operational basic switch and has great flexibility.

The workstation application was developed to take advantage of the power and flexibility of the ISOS operating system. It provides a high level of Communication Assistant control processing with complete flexibility to connect any type of call protocol to any other type of call protocol. A database was developed to maintain a profile of each caller to speed up call connections and to provide information for tailored call processing.

**The switching system used by LRS contains a fully redundant central processing unit on hot standby with automatic failover.** This is to ensure that no calls are dropped due to technical failure. It also has a redundant power supply on hot standby. Backup control and database servers are also on hot standby with automatic failover. LRS maintains an inventory of spare critical components for the switching system onsite to ensure that the required levels of service are met (listed below).

The switch used by LRS is a high-speed, stand-alone, non-blocking digital switching matrix. The system is fully redundant to insure quality, reliable performance. The system utilizes a standard T1 interface that enables it to be linked to other digital switches. All cards and power supplies within the system are redundant which gives us the flexibility to switch from one side of the switch to the other to perform updates or to troubleshoot without interrupting call processing. The system is set up to automatically access the secondary operating system on the switch with no human intervention. The system auto-detects any problems and moves to the secondary system immediately if necessary.

The on-sight switching system spare equipment includes:

- D4 channel bank
- All required channel bank cards
- T1 CSU packs
- Switch T-1 card
- Switch conference card

If one of the switching systems used by LRS cannot be returned to service by transferring control to redundant equipment, the calls automatically will overflow to another switching system. Switching systems used by LRS are designed to provide a very high level of operational security with two fully redundant processors and power supplies in each switch. Each fully redundant control system, which includes keyboard, monitor and printer capabilities, are used to control and monitor each of the switching systems. **The control systems provide online system monitoring and real-time programming capabilities that will not take the system off-line and the ability to perform preventative maintenance or repair while the system is online.** Remote capabilities are also provided so the system can be remotely monitored, reconfigured or controlled as necessary. All of this is provided to insure the required levels of service are always met.

### **Backup Power**

The backup power supply system fully complies with and exceeds the requirements for uninterruptible power. An uninterruptible power source with full battery backup is available to operate the LRS at full capacity for extended periods of time. **LRS also has automatically**

**activated generator back-up capabilities allowing it to provide relay service for days and weeks at a time during power outages.**

This power system supports the switch system and its peripherals, switch room and CA work site emergency lights and system alarms, CA consoles/terminals, Call Detail Recording, Supervisory and traffic monitoring consoles, Customer Service and administrative phone and voice mail systems, and building security systems.

LRS' relay provider maintains auxiliary power sources for nine central offices in addition to all its relay centers. All of Hamilton's back-up power systems are comparable to central office auxiliary power sources in terms of time and capacity. Please Appendix C for Hamilton's Disaster Recovery Plan.

*(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.*

Using flexible software and hardware (i.e. common equipment frames, standard T1 interfaces, windows NT servers, UNIX operating System, etc.) where components can easily be modified in order to accommodate new technology, **the platform used by LRS is ideal for today's rapidly changing technologically advanced environment.** LRS' relay provider can quickly add new features and make changes based on the input from relay users and from our internal evaluations. LRS' relay provider takes advantage of innovations and technological improvements to enhance the State of Louisiana's relay service.

As a telecommunications company, LRS' relay provider is on the leading edge of new technology. Hamilton is an Internet provider, cable television provider, computer supplier and a general telecommunications provider. There are new advances in these areas every day. Hamilton is constantly watching for opportunities to use the technological advances in these areas in relay. Hamilton keeps the RAB informed about any new types of technology that become available.

LRS relies on user feedback a great deal to set its technological development priorities. LRS is also involved in several industry groups to stay abreast of the latest FCC activities, user needs, and developing technology.

### **Signaling System Seven (SS7)**

**The relay platform used by LRS has made use of SS7 signaling since February 2002.** The Relay platforms have been retrofitted to deliver Caller ID in the same manner that these services are delivered today in the public switched network (i.e. LRS provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box).

Please see Tab 6 for listing of the current technology provided by Hamilton that exceeds the above minimum standards.

*(6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.*

### **True Caller ID**

**Through the use of SS7 signaling LRS provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box. LRS provides this information on all call types and on all carriers. LRS brings true functional equivalence to Louisiana Caller ID relay users.**

LRS receives and passes calling line identification information, **including blocking information** from all users calling through the relay service. If the Caller ID block indicator is enabled on the call when LRS receives it, the relay caller's number is not passed on to the called party. The call blocking information passes through automatically to the called party with no relay intervention. The relay user has complete control over blocking information with their local phone company. Please see Appendix A for more information.



## **Tab 5**

### **Functional Standards**



**Louisiana**  
Relay

*(c) Functional standards--*

*(1) Consumer complaint logs.*

*(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.*

Louisiana Relay tracks all TRS complaints and all other customer service activity. Louisiana Relay maintains a log of consumer complaints alleging a violation of federal minimum standards as it relates to the provisioning of Telecommunications Relay Service and retains the log for the State until the FCC grants the next application for certification.

All complaints made through the toll-free Customer Service number, the customer inquiry form or on-line feedback form, whether in writing or in person, are documented in the Customer Service database. All resolutions are also documented in this database. **All information is kept on file and available to the RAB and FCC.** Each database record includes the name and/or address of the complainant, the date and time received, the Communication Assistant identification number, the nature of the complaint, the specific relief or satisfaction sought, the result of the investigation, the resolution of the complaint and date of the resolution. The customer service representative responsible for handling the complaint is also indicated.

The RAB's complaint log is associated with the following database categories:

- Miscellaneous External Complaints
- LEC External Busy
- 911 External Calls
- No Notice of How to Complain to FCC
- CA Accuracy/Spelling/Verbatim
- CA Gave Wrong Information
- CA Did Not Keep User Informed
- CA Hung Up on Caller
- CA Misdialed Number
- CA Typing Speed
- Didn't Follow Voice Mail/Recording Procedure
- CA Typing
- Improper Use of Speed Dialing
- Poor Vocal Clarity/Enunciation
- Improperly Handled ASL or Related Culture Issues
- Improper Use of Call Release
- Improper Handling of Three Way Calling
- Caller ID Not Working Properly
- Improper Use of Customer Data
- Fraudulent/Harassment Call

- Replaced CA Improperly in Middle of Call
- Didn't Follow Emergency Call Handling Procedure
- CA Didn't Follow Policy/Procedure
- Confidentiality Breach
- Spanish to Spanish Call Handling Problems
- Miscellaneous Service Complaints
- Ringing/No Answer
- Speech to Speech Call Handling Problems
- Connect Time (TTY-Voice)
- Busy Signal/Blockage
- ASCII/Baudot Break-down
- STS Break-Down
- HCO Break-Down
- Relay Not Available 24 Hours a Day
- 711 Problems
- VCO Break-Down
- Miscellaneous Technical Complaints
- Line Disconnected
- Carrier of Choice not Available/Other Equal Access
- CapTel Complaints

*(ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.*

Louisiana Relay reports complaint activity to the RAB on a monthly basis. The RAB, submits the necessary information to the FCC as required in § 64.601 Mandatory Minimum Standards on an annual basis. The RAB has included copies of its 2002 through 2007 logs in this application for renewal of current state certification. These logs are included in Appendix F. Louisiana Relay issues each complaint a Record ID number to enable the RAB and the FCC to quickly and easily identify the details of those particular complaints and contact information of the complainant.

*(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:*

*(i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;*

*(ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and*

*(iii) The physical address to which correspondence should be sent.*

RAB has submitted to the Commission a contact person for TRS consumer information and complaints about Intrastate TRS. The submission includes the name and address of the State office that receives complaints, grievances, inquiries and suggestions, voice and TTY telephone numbers, fax number, e-mail address, web address, and physical address to which correspondence should be sent. Following is the name of the contact at the RAB for those purposes:

Cheryl Capello  
Louisiana Public Service Commission  
One American Place, Suite 1630, PO Box 91154  
Baton Rouge, LA 70821-9154  
Tel/TTY 225-343-4848  
E-mail [cherylc@lusc.org](mailto:cherylc@lusc.org)

Other Louisiana contacts: Relay Administration Board

Larry Henning, President  
Tel 225-927-1377; Fax 225-927-1378  
E-mail [larryh@ltassn.org](mailto:larryh@ltassn.org)

Thelma Covello, Vice President  
Tel 337-239-7056 TDD; Fax 337-239-3817  
E-mail [lsucajunlady@aol.com](mailto:lsucajunlady@aol.com)

Buddy Stricker, Secretary/Treasurer  
Voice: (225)-342-5710  
E-mail: [buddy.stricker@la.gov](mailto:buddy.stricker@la.gov)

Julia Thornton  
Voice: (225) 753-1531  
E-mail: [julia.thornton@centrytel.com](mailto:julia.thornton@centrytel.com)

Bonnie Eades, Member  
Tel 504-528-2090; Fax 504-528-9427  
E-mail [bonnie.eades@bellsouth.com](mailto:bonnie.eades@bellsouth.com)

TRS Provider: [Hamilton Relay](#)

The Hamilton Telephone Company d/b/a Hamilton Telecommunications, the provider of Louisiana Relay, has submitted to the Commission a contact person for TRS consumer information and complaints about Hamilton's service. The submission includes the name and address of the state office that receives complaints, grievances, inquiries and suggestions, voice and TTY telephone numbers, fax number, e-mail address, and physical address to which correspondence should be sent. Following is the name of the contact at The Hamilton Telephone Company for those purposes:

Dixie Ziegler  
Vice President of Relay  
Hamilton Relay, Inc.  
1001 12th Street  
Aurora, NE 68818  
Voice/TTY: 402-694-3656  
Toll Free: 800-618-4781  
Fax: 402-694-5037  
E-mail: [dixie.ziegler@hamiltonrelay.com](mailto:dixie.ziegler@hamiltonrelay.com)  
Website: [www.hamiltonrelay.com](http://www.hamiltonrelay.com)

*(3) Public access to information. Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.*

### **Community Outreach, Public Relations and Educational Programs**

Louisiana Relay provides a community and business outreach program that educates **all** people in Louisiana about the relay service. This program goes beyond gaining customer feedback. Rather, this program *educates* and markets relay services (i.e. public awareness of 711 and TRS) across Louisiana. Hearing people hanging up on the relay is still the number one outreach problem. The outreach programs Louisiana Relay uses focus on the need to educate the hearing community, as you will see below. This meets the FCC requirements, which calls for outreach to all telephone users. Louisiana Relay performs outreach activities for all relay user communities via promotional events, presentations, workshops, and instructional seminars. Louisiana Relay always adjusts its programs to meet the specific needs of every audience.

The outreach program Louisiana Relay uses specifically targets deaf, hard of hearing, late deafened, deaf-blind, speech disabled individuals as well as their family and friends. Louisiana Relay also targets voice users, businesses and professionals, trade shows, civic organizations, public schools and university students. Appendix G contains a list of Outreach activities performed in Louisiana, copies of directory pages, billing inserts, as well as educational brochures which illustrate the various call types available through Louisiana Relay.

As discussed previously, Louisiana Relay performs a variety of activities to inform the telecommunications-using public about relay. From attendance at a variety of activities, which cater to relay users, (Louisiana Relay participates in Louisiana organizations' activities that serve relay users) to educating business and professionals, trade shows, civic organizations, public schools and university students and other groups about relay, Louisiana Relay is promoting the use of the relay. Louisiana Relay understands that these groups could connect more effectively

with deaf and hard of hearing customers/clients through use of and knowledge of telephone relay services.

The Outreach programs Louisiana Relay uses include media advertisements, demonstration of equipment and distribution of informational materials describing how to use the relay service. The Outreach Team presents relay information to organizations and groups, including relay user groups, meet with businesses, schools and other public and private entities (including libraries) to describe relay and how it works, and meets with individuals or groups of relay users to demonstrate equipment and answer questions. The Louisiana Relay Outreach Team works with the elderly and speech disabled to promote use of the relay. Louisiana Relay also uses public relations campaigns and uses media advertisements to expose relay to a broader audience of people throughout Louisiana. As stated previously, Louisiana Relay has had great success by personalizing its outreach efforts through an in-state outreach program. The tactics Louisiana Relay use to accomplish all of this are listed below.

- PSAs and Other Media Advertisement
- Educational Videos
- Press Releases
- Presentations
- Exhibits:
- Train the Trainers Program
- One-on-One Visits/Hard of Hearing and Elderly Strategies
- Outreach to Businesses
- FCC Payphone Relay Plan
- Town Hall Meetings
- Outreach to Spanish
- Customized Outreach Materials
- Promotional Materials
- Relay Brochure
- Description of Complaint Procedures in Printed Materials
- Newsletters
- Web site
- Bill Inserts and Directory Pages
- Involvement of Deaf and State Agencies

*(4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.*

As explained in Tab 4, Louisiana Relay's provider performs no billing. All billing is performed by the relay users' carrier of choice for both intralata and interlata toll calls. Thus the relay users' carrier of choice bills all intralata and interlata toll calls at their applicable discounted rate for relay users. Louisiana Relay's provider forwards the appropriate information digits identifying the call as a relay call to the carrier so that it can be identified as a relay call, rated and billed accordingly by the carrier. Each carrier providing long distance service to relay users



is responsible to ensure that TRS users shall pay no greater than the rates paid for functionally equivalent voice communication services.

*(5) Jurisdictional separation of costs.*

*(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended.*

Louisiana Relay's provider presents NECA with a billing statement for all interstate minutes of relay in accordance with the requirements of NECA and consistent with FCC rulings. All intrastate minutes of use are compensated from the Louisiana Relay Fund.

*(ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under § 64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.*

Please refer to Tab 7 for a complete description of the State of Louisiana's funding mechanism.

*(iii) Telecommunications Relay Services Fund. Effective July 26, 1993, an Interstate Cost Recovery Plan, hereinafter referred to as the TRS Fund, shall be administered by an entity selected by the Commission (administrator). The initial administrator, for an interim period, will be the National Exchange Carrier Association, Inc.*

Not applicable.

*(A) Contributions. Every carrier providing interstate telecommunications services shall contribute to the TRS Fund on the basis of interstate end-user telecommunications revenues as described herein. Contributions shall be made by all carriers who provide interstate services, including, but not limited to, cellular telephone and paging, mobile radio, operator services, personal communications service (PCS), access (including subscriber line charges), alternative access and special access, packet-switched, WATS, 800, 900, message telephone service (MTS), private line, telex, telegraph, video, satellite, intraLATA, international and resale services.*

Not applicable.

*(B) Contribution computations. Contributors' contribution to the TRS fund shall be the product of their subject revenues for the prior calendar year and a contribution factor determined annually by the Commission. The contribution factor shall be based on the ratio between expected TRS Fund expenses to interstate end-user telecommunications revenues. In the event that contributions exceed TRS payments and administrative costs, the contribution factor for the*

*following year will be adjusted by an appropriate amount, taking into consideration projected cost and usage changes. In the event that contributions are inadequate, the fund administrator may request authority from the Commission to borrow funds commercially, with such debt secured by future years' contributions. Each subject carrier must contribute at least \$25 per year. Carriers whose annual contributions total less than \$1,200 must pay the entire contribution at the beginning of the contribution period. Service providers whose contributions total \$1,200 or more may divide their contributions into equal monthly payments. Carriers shall complete and submit, and contributions shall be based on, a "Telecommunications Reporting Worksheet" (as published by the Commission in the Federal Register). The worksheet shall be certified to by an officer of the contributor, and subject to verification by the Commission or the administrator at the discretion of the Commission. Contributors' statements in the worksheet shall be subject to the provisions of section 220 of the Communications Act of 1934, as amended. The fund administrator may bill contributors a separate assessment for reasonable administrative expenses and interest resulting from improper filing or overdue contributions. The Chief of the Consumer & Governmental Affairs Bureau may waive, reduce, modify or eliminate contributor reporting requirements that prove unnecessary and require additional reporting requirements that the Bureau deems necessary to the sound and efficient administration of the TRS Fund.*

Not applicable.

*(C) Data collection from TRS Providers. TRS providers shall provide the administrator with true and adequate data necessary to determine TRS fund revenue requirements and payments. TRS providers shall provide the administrator with the following: total TRS minutes of use, total interstate TRS minutes of use, total TRS operating expenses and total TRS investment in general accordance with part 32 of the Communications Act, and other historical or projected information reasonably requested by the administrator for purposes of computing payments and revenue requirements. The administrator and the Commission shall have the authority to examine, verify and audit data received from TRS providers as necessary to assure the accuracy and integrity of fund payments.*

Not applicable.

*(D) [Reserved]*

*(E) Payments to TRS Providers. TRS Fund payments shall be distributed to TRS providers based on formulas approved or modified by the Commission. The administrator shall file schedules of payment formulas with the Commission. Such formulas shall be designed to compensate TRS providers for reasonable costs of providing interstate TRS, and shall be subject to Commission approval. Such formulas shall be based on total monthly interstate TRS minutes of use. TRS minutes of use for purposes of interstate cost recovery under the TRS Fund are defined as the minutes of use for completed interstate TRS calls placed through the TRS center beginning after call set-up and concluding after the last message call unit. In addition to the data required under paragraph (c)(5)(iii)(C) of this section, all TRS providers, including providers who are not interexchange carriers, local exchange carriers, or certified state relay providers, must submit reports of interstate TRS minutes of use to the administrator in order to receive payments. The*



*administrator shall establish procedures to verify payment claims, and may suspend or delay payments to a TRS provider if the TRS provider fails to provide adequate verification of payment upon reasonable request, or if directed by the Commission to do so. The TRS Fund administrator shall make payments only to eligible TRS providers operating pursuant to the mandatory minimum standards as required in § 64.604, and after disbursements to the administrator for reasonable expenses incurred by it in connection with TRS Fund administration. TRS providers receiving payments shall file a form prescribed by the administrator. The administrator shall fashion a form that is consistent with parts 32 and 36 procedures reasonably tailored to meet the needs of TRS providers. The Commission shall have authority to audit providers and have access to all data, including carrier specific data, collected by the fund administrator. The fund administrator shall have authority to audit TRS providers reporting data to the administrator. The formulas should appropriately compensate interstate providers for the provision of VRS, whether intrastate or interstate.*

Not applicable.

*(F) TRS providers eligible for receiving payments from the TRS Fund are:*

*(1) TRS facilities operated under contract with and/or by certified state TRS programs pursuant to § 64.605; or*

*(2) TRS facilities owned by or operated under contract with a common carrier providing interstate services operated pursuant to § 64.604; or*

*(3) Interstate common carriers offering TRS pursuant to § 64.604.*

Not applicable.

*(G) Any eligible TRS provider as defined in paragraph (c)(5)(iii)(F) of this section shall notify the administrator of its intent to participate in the TRS Fund thirty (30) days prior to submitting reports of TRS interstate minutes of use in order to receive payment settlements for interstate TRS, and failure to file may exclude the TRS provider from eligibility for the year.*

Not applicable.

*(H) Administrator reporting, monitoring, and filing requirements. The administrator shall perform all filing and reporting functions required in paragraphs (c)(5)(iii)(A) through (c)(5)(iii)(J) of this section. TRS payment formulas and revenue requirements shall be filed with the Commission on May 1 of each year, to be effective the following July 1. The administrator shall report annually to the Commission an itemization of monthly administrative costs which shall consist of all expenses, receipts, and payments associated with the administration of the TRS Fund. The administrator is required to keep the TRS Fund separate from all other funds administered by the administrator, shall file a cost allocation manual (CAM) and shall provide the Commission full access to all data collected pursuant to the administration of the TRS Fund. The administrator shall account for the financial transactions of the TRS Fund in accordance with generally accepted accounting principles for federal agencies and maintain the accounts of*

*the TRS Fund in accordance with the United States Government Standard General Ledger. When the administrator, or any independent auditor hired by the administrator, conducts audits of providers of services under the TRS program or contributors to the TRS Fund, such audits shall be conducted in accordance with generally accepted government auditing standards. In administering the TRS Fund, the administrator shall also comply with all relevant and applicable federal financial management and reporting statutes. The administrator shall establish a non-paid voluntary advisory committee of persons from the hearing and speech disability community, TRS users (voice and text telephone), interstate service providers, state representatives, and TRS providers, which will meet at reasonable intervals (at least semi-annually) in order to monitor TRS cost recovery matters. Each group shall select its own representative to the committee. The administrator's annual report shall include a discussion of the advisory committee deliberations.*

Not applicable.

*(I) Information filed with the administrator. The administrator shall keep all data obtained from contributors and TRS providers confidential and shall not disclose such data in company-specific form unless directed to do so by the Commission. Subject to any restrictions imposed by the Chief of the Consumer & Governmental Affairs Bureau, the TRS Fund administrator may share data obtained from carriers with the administrators of the universal support mechanisms (See 47 CFR 54.701 of this chapter), the North American Numbering Plan administration cost recovery (See 47 CFR 52.16 of this chapter), and the long-term local number portability cost recovery (See 47 CFR 52.32 of this chapter). The TRS Fund administrator shall keep confidential all data obtained from other administrators. The administrator shall not use such data except for purposes of administering the TRS Fund, calculating the regulatory fees of interstate common carriers, and aggregating such fee payments for submission to the Commission. The Commission shall have access to all data reported to the administrator, and authority to audit TRS providers. Contributors may make requests for Commission nondisclosure of company-specific revenue information under § 0.459 of this chapter by so indicating on the Telecommunications Reporting Worksheet at the time that the subject data are submitted. The Commission shall make all decisions regarding nondisclosure of company-specific information.*

Not applicable.

*(J) The administrator's performance and this plan shall be reviewed by the Commission after two years.*

Not applicable.

*(K) All parties providing services or contributions or receiving payments under this section are subject to the enforcement provisions specified in the Communications Act, the Americans with Disabilities Act, and the Commission's rules.*

Not applicable.

*(6) Complaints.*

*(i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under § 64.605 is in effect, the Commission shall refer such complaint to such state expeditiously.*

*(ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.*

The RAB will resolve all intrastate complaints within 180 days after the complaint is first filed with the State, regardless of whether the complaint is filed with the state relay administrator, a state PUC, the relay provider or with any other state entity.

*(iii) Jurisdiction of Commission. After referring a complaint to a state entity under paragraph (c)(6)(i) of this section, or if a complaint is filed directly with a state entity, the Commission shall exercise jurisdiction over such complaint only if:*

*(A) Final action under such state program has not been taken within:*

*(1) 180 days after the complaint is filed with such state entity; or*

*(2) A shorter period as prescribed by the regulations of such state; or*

*(B) The Commission determines that such state program is no longer qualified for certification under § 64.605.*

The RAB understands that if it does not provide a resolution to a complaint that the FCC may exercise jurisdiction.

*(iv) The Commission shall resolve within 180 days after the complaint is filed with the Commission any interstate TRS complaint alleging a violation of section 225 of the Act or any complaint involving intrastate relay services in states without a certified program. The Commission shall resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.*

The RAB understands that the Commission will resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

*(v) Complaint Procedures. Complaints against TRS providers for alleged violations of this subpart may be either informal or formal.*

*(A) Informal Complaints.*

*(1) Form. An informal complaint may be transmitted to the Consumer & Governmental Affairs Bureau by any reasonable means, such as letter, facsimile transmission, telephone*

*(voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.*

*(2) Content. An informal complaint shall include the name and address of the complainant; the name and address of the TRS provider against whom the complaint is made; a statement of facts supporting the complainant's allegation that the TRS provided it has violated or is violating section 225 of the Act and/or requirements under the Commission's rules; the specific relief or satisfaction sought by the complainant; and the complainant's preferred format or method of response to the complaint by the Commission and the defendant TRS provider (such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate the complainant's hearing or speech disability).*

*(3) Service; designation of agents. The Commission shall promptly forward any complaint meeting the requirements of this subsection to the TRS provider named in the complaint. Such TRS provider shall be called upon to satisfy or answer the complaint within the time specified by the Commission. Every TRS provider shall file with the Commission a statement designating an agent or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission. Such designation shall include a name or department designation, business address, telephone number (voice and TTY), facsimile number and, if available, internet e-mail address.*

*(B) Review and disposition of informal complaints.*

*(1) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this subpart. Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail.*

*(2) A complainant unsatisfied with the defendant's response to the informal complaint and the staff's decision to terminate action on the informal complaint may file a formal complaint with the Commission pursuant to paragraph (c)(6)(v)(C) of this section.*

**The RAB will assist as necessary in this process.**

*(C) Formal complaints. A formal complaint shall be in writing, addressed to the Federal Communications Commission, Enforcement Bureau, Telecommunications Consumer Division, Washington, DC 20554 and shall contain:*

*(1) The name and address of the complainant,*

*(2) The name and address of the defendant against whom the complaint is made,*

*(3) A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and*

*(4) The relief sought.*

*(D) Amended complaints. An amended complaint setting forth transactions, occurrences or events which have happened since the filing of the original complaint and which relate to the original cause of action may be filed with the Commission.*

*(E) Number of copies. An original and two copies of all pleadings shall be filed.*

*(F) Service.*

*(1) Except where a complaint is referred to a state pursuant to §64.604(c)(6)(i), or where a complaint is filed directly with a state entity, the Commission will serve on the named party a copy of any complaint or amended complaint filed with it, together with a notice of the filing of the complaint. Such notice shall call upon the defendant to satisfy or answer the complaint in writing within the time specified in said notice of complaint.*

*(2) All subsequent pleadings and briefs shall be served by the filing party on all other parties to the proceeding in accordance with the requirements of § 1.47 of this chapter. Proof of such service shall also be made in accordance with the requirements of said section.*

*(G) Answers to complaints and amended complaints. Any party upon whom a copy of a complaint or amended complaint is served under this subpart shall serve an answer within the time specified by the Commission in its notice of complaint. The answer shall advise the parties and the Commission fully and completely of the nature of the defense and shall respond specifically to all material allegations of the complaint. In cases involving allegations of harm, the answer shall indicate what action has been taken or is proposed to be taken to stop the occurrence of such harm. Collateral or immaterial issues shall be avoided in answers and every effort should be made to narrow the issues. Matters alleged as affirmative defenses shall be separately stated and numbered. Any defendant failing to file and serve an answer within the time and in the manner prescribed may be deemed in default.*

*(H) Replies to answers or amended answers. Within 10 days after service of an answer or an amended answer, a complainant may file and serve a reply which shall be responsive to matters contained in such answer or amended answer and shall not contain new matter. Failure to reply will not be deemed an admission of any allegation contained in such answer or amended answer.*

*(I) Defective pleadings. Any pleading filed in a complaint proceeding that is not in substantial conformity with the requirements of the applicable rules in this subpart may be dismissed.*

The RAB will assist as necessary in this process.

### **Supplemental Information:**

Intrastate Louisiana Relay complaints are processed in the following manner for the RAB by its TRS provider:

Trained personnel located within the State of Louisiana answer all Louisiana Relay Customer Service calls. Louisiana Relay provides a 24 hour a day, 7 days a week customer service via a toll-free telephone number, accessible from anywhere in the U.S., to assist TTY and voice callers

with Louisiana TRS inquiries and complaints. Customers may also contact Louisiana Relay via e-mail and through the Louisiana relay web-site; in person; as well as in writing. Any caller to the relay center having a complaint can reach a supervisor or customer service representative while still on line during a relay call. Louisiana Relay processes any complaints, which originate via e-mail, fax, telephone, regular mail, outreach events, at the workstations, etc.

Ultimately responsible for processing all inquiries, comments and complaints is Louisiana's Relay Center Manager. The Vice President of Relay also views all complaint information.

In the event of a complaint regarding the Louisiana Relay, trained staff will follow an established procedure of complaint resolution. This process varies depending on the gravity of the situation.

- A Complaint involving a Communication Assistant is directed to the Communication Assistant's Supervisor and the Lead Supervisor. Constructive feedback will be shared with the Communication Assistant and appropriate coaching, re-training and counseling steps will be taken by the primary Supervisor to resolve the situation. Louisiana Relay's detailed call records show each key command (not actual text) the CA makes. Louisiana Relay can easily investigate Louisiana Relay CA complaints and take disciplinary action when needed.
- Complaints regarding service/procedure issues are directed to the appropriate internal personnel. Technical issues are given to the technical support staff Louisiana Relay uses and addressed immediately. Procedural issues are discussed at internal quality meetings.

All complaints are reviewed by the Louisiana Relay Center Manager to ensure that any complaints have been resolved to the customer's satisfaction. The Customer Service Team resolves most customer service complaints. If further action is needed, the complaint is escalated to the Vice President of Relay Service for Hamilton, and then to the RAB when needed. All complaints are resolved within 10 calendar days depending on the complexity of the problem. Louisiana Relay describes the above procedures and FCC complaint processes, including contact information for both the RAB and the FCC, in appropriate printed outreach material that is distributed to the general public.

If the user is not satisfied with the resolution of the complaint by Louisiana Relay or with any action taken, Louisiana Relay's monthly report to the RAB will so state. The user then has the opportunity and is given written notice of that opportunity by Louisiana Relay to have the complaint and action of Louisiana Relay reviewed by the RAB for such action as it may deem appropriate in accordance with its rules and regulation. The RAB will act on such complaint no later than 180 days from the filing of the complaint.

The RAB will process all complaints referred by the Federal Communication's Commission for intrastate Telecommunications Relay Service for the State of Louisiana. The RAB will cooperate in the investigation or resolution of any and all complaints concerning the Louisiana Relay with the Federal Communication's Commission.

*(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision.*

*Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.*

All contracts between the RAB and The Hamilton Telephone Company d/b/a Hamilton Telecommunications provide for the transfer of TRS customer profile data from Hamilton to the incoming TRS vendor. Hamilton will provide the above mentioned data to the new vendor at least 60 days prior to the conclusion or termination of the contract.

Hamilton does not and will not use this data for any purpose other than connecting the Louisiana Relay user to his/her called party. Hamilton has not and will never make any relay information available for sale or distribution. Hamilton will not sell, distribute, share or reveal in any way the information referenced above.



## **Tab 6**

# **Exceeding FCC Minimum Standards**



**Louisiana**  
Relay



#### **§64.605 STATE CERTIFICATION.**

*(a) State documentation—(1) Certified state program. Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned “TRS State Certification Application.” All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.*

Please refer to Tabs 3, 4 and 5 for a paragraph by paragraph response describing Louisiana’s program for implementing and managing intrastate TRS service. The State of Louisiana is currently certified to provide intrastate TRS through July 26, 2008. This application is submitted to re-certify the State of Louisiana for an additional five years.

*(b) (1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:*

*(i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604;*

Please refer to Tabs 3, 4 and 5 of this application for a description of how the state of Louisiana meets or exceeds all operational, technical and functional minimum standards contained in §64.604.

*(ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and*

Please refer to Tab 1 for a copy of the State of Louisiana’s rules and regulations governing telecommunications relay service. The RAB regulates the provision of telecommunications service in the State of Louisiana and has established rules and procedures for service standards as well as complaint resolution and other necessary enforcement remedies. The contract entered into between the RAB and Hamilton Telephone Company provides that all state and federal laws shall be complied with. Failure to do so by Hamilton would be a breach-of-contract for which the RAB could terminate the agreement with Hamilton and seek such other remedies as may be available by law. Consumers also have the opportunity pursuant to the established rules of the RAB to file complaints or petitions concerning the Louisiana Relay requesting modifications in the provision of this service or otherwise resolving issues or concerns of the public.

*(iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.*

*(2)(iii) Where the TRS service differs from the mandatory minimum standards contained in §64.604, the VRS and/or IP Relay provider establishes that its service does not violate applicable mandatory minimum standards.*

As demonstrated in the following section, where the Louisiana Relay program exceeds the mandatory minimum standards contained in §64.604, Louisiana Relay establishes that its program in no way conflicts with federal law.

The Louisiana Relay does exceed some of the mandatory minimum standards contained in Section 64.604 in terms of the following items:

### **CA Training and Procedures**

Louisiana Relay not only meets, but also exceeds FCC Communication Assistant standards. Louisiana Relay is dedicated to providing high quality relay service - from its hiring and training practices to typing speed and accuracy to in-call replacement of CAs. Louisiana Relay trains its Communication Assistants to relay calls in a manner that not only exceeds FCC standards, but also prepares them to relay calls in a fashion that meets each need of the relay users in Louisiana.

### **Ability to TYPE at 60 wpm**

Louisiana Relay Communication Assistants must TYPE 60 words per minute. **Louisiana Relay exceeds this service level by requiring CAs to maintain a 95% accuracy level in addition to 60-wpm typing.** The Louisiana Center has an average typing speed of 68.48 wpm with 96.91% accuracy.

### **Answer performance**

Louisiana Relay exceeds Federal mandatory minimum standards in regards to answer performance. Except during network failure, Louisiana Relay **answers** ninety percent (90%) of all calls within 10 seconds, on a daily basis and (95%) of all calls within 10 seconds, on a monthly basis, all measurements include abandoned calls. This results in the caller's call immediately being placed, not put in a queue or on hold on a daily basis for the State of Louisiana. Louisiana Relay begins measuring Average Answer time from the moment a relay call arrives at its relay switch (i.e. in the TRS center's network). As soon as Louisiana Relay's equipment accepts the call from the LEC and the public switched network delivers the call to the TRS center, Louisiana Relay starts its call detail record to capture answer time data.

### **Turbo Code**

Louisiana Relay exceeds the FCC requirement that TRS shall be capable of communicating with ASCII and Baudot formats, at any speed generally in use. Louisiana Relay provides Turbo Code, a proprietary alternate protocol developed by Ultratec, as an enhanced protocol and has secured a license from Ultratec to use this protocol in its relay modems. Louisiana Relay users are able to automatically connect "Turbo Code" on every relay call type. With Turbo Code, Louisiana Relay users can use their Turbo Code Interrupt feature.

### **Intrastate Spanish**

In addition to Interstate Spanish to Spanish, Louisiana Relay provides Intrastate Spanish to Spanish call handling to the relay users of Louisiana and processes all the same call types on its Spanish lines as it does on its English voice and TTY lines.

When recruiting and training bilingual CAs, Louisiana Relay requires Spanish CAs to pass a Spanish test, attend a Spanish orientation class and take all standard CA and Speech to Speech training prior to relaying Spanish to Spanish calls. Hamilton macros automatically change to Spanish as needed.

### **SS7 Signaling**

**The relay platform used by Louisiana Relay has made use of SS7 signaling since February 2002.** The Relay platforms have been retrofitted to deliver Caller ID in the same manner that these services are delivered today in the public switched network (i.e. Louisiana Relay provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box).

### **Internet Relay**

The provider of Louisiana Relay offers Internet Protocol Relay to end-users. The FCC has allowed the recovery of the costs of Internet Protocol Relay from the Interstate TRS Fund. Hamilton Internet Relay meets all FCC internet relay standards. A description of Hamilton's Internet Relay offering follows:

Hamilton Relay Internet is a 24-hour service that allows computers and other web-based devices to connect to Hamilton Relay via the Internet to call any standard telephone user, VCO user or HCO user. The relay user with a computer or other similar device and access to the Internet goes to Hamilton's relay website at [www.hamiltonrelay.com](http://www.hamiltonrelay.com) to place a relay call. An Internet connection server is available on the worldwide web to handle Internet relay connection requests. When an Internet connection request is received, it places an entry in the main relay switch queue and is assigned to the first available workstation. The workstation makes an Internet connection to the requesting user and the call is processed just like all other inbound test relay calls. Since there is no way to determine where the Internet call originated from, all Internet relay calls are placed free of charge to the originating user.

### **Video Relay**

The provider of Louisiana Relay offers Video Relay to end-users. The FCC has allowed the recovery of the costs of Video Relay from the Interstate TRS Fund. Hamilton Relay VRS provides maximum user flexibility and ease of operation. Hamilton Relay VRS meets all FCC video relay standards. A description of Hamilton's Video Relay offering follows:

Hamilton Relay VRS gives relay users access to sign language interpreters at the relay center via locations (i.e. homes, offices, etc.) equipped with video conference equipment. Instead of using a telephone and/or TTY, a relay user calls the relay and uses video equipment (i.e. a computer equipped with desktop conferencing software and a camera or a television and appropriate video

equipment). An interpreter at the relay center answers the call, and begins to communicate in sign language with the caller. The interpreter asks for the number to be called, or receives it as text from the user, and places the call. The interpreter then begins to relay the call by translating the calling party's sign language into voice for the called party. The relay call is then translated from voice to sign language.

The user reaches the video relay system via the Internet (a web page or IP address) and the equipment at the operator workstation and the video user's equipment will automatically set up for the highest speed at which the two units can mutually operate.

*(c)(1) State certification period. State certification shall remain in effect for five years. One year prior to expiration of certification, a state may apply for renewal of its certification by filing documentation as prescribed by paragraphs (a) and (b) of this section.*

The State of Louisiana is currently certified to provide intrastate TRS. The State of Louisiana is requesting certification beginning July 26, 2008, continuing for a five-year period.

*(d) Method of funding. Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.*

Please refer to Tab 7 for a complete description of the State of Louisiana's funding mechanism.

*(e)(1) Suspension or revocation of state certification. The Commission may suspend or revoke such certification if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. In a state whose program has been suspended or revoked, the Commission shall take such steps as may be necessary, consistent with this subpart, to ensure continuity of TRS. The Commission may, on its own motion, require a certified state program to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a state program may not be in compliance with the minimum standards.*

The Louisiana program has never been suspended or revoked and will continue to meet all FCC requirements necessary for certification.

*(f) Notification of substantive change. (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.*

Louisiana Relay understands and will notify the Commission of substantive changes in its TRS programs within 60 days of when they occur, and will certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

By this application the RAB intends that the operation of the Louisiana Relay will continue to be in compliance with the Federal Communication Commission rules and orders regarding

telecommunications relay service. If there is any technical or substantial variation discovered by the Federal Communication Commission that would cause or could cause the Louisiana Relay to be out of compliance, the RAB agrees to take such action as may be reasonably required to bring the Louisiana Relay into compliance.

## Tab 7 Method of Funding



**BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION**

**ORDER NO. U-17656 – C**

**LOUISIANA PUBLIC SERVICE COMMISSION, EX PARTE.**

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*In re: Investment of Accumulated Funds for Future Provision of Relay Services and Consideration of Reduction or Suspension of Collection of the \$0.11 Per Month Access Charge.*

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(Decided at the January 16, 2002 Open Session)

**Background**

By Act 660 of 1988, the Louisiana Legislature established a \$0.05 per month surcharge on all telephone access lines beginning September 1, 1988 and dedicated to the creation and implementation of telecommunications relay services (“TRS”), and charged the Louisiana Commission for the Deaf (“LCD”) with the responsibility for the TRS program. The LCD formed the Telephone Access Program Board (“TAPB”) to implement LCD’s directives under Act 660. The TAPB determined that the \$0.05 per month surcharge would be insufficient to fund all aspects of TRS. When the TAPB requested help in obtaining additional funding, the LPSC undertook to ascertain additional funding sources and created the Deaf Task Force (the “DTF”) to make recommendations on that issue.

In July 1990, the Americans with Disabilities Act (the “ADA”) was signed into law. The ADA provided that, within three years after July 26, 1990, each common carrier providing telephone voice transmission services shall provide TRS. The ADA provided that if a State had a certified program for implementing intrastate TRS, each common carrier in that State would be considered in compliance with the implementing regulations if the common carrier was in compliance with the certified State program;

In its Order No. U-17656-A, this Commission accepted responsibility for the development and review of options to effect compliance with the telecommunications provisions of the ADA, particularly the requirements as to the provision of intrastate TRS. The Commission created and authorized the Louisiana Relay Administration Board (“RAB”) as a charitable organization to oversee TRS operations, in particular, the establishment, administration and promotion of a statewide program to provide access to all telecommunications services by persons who are deaf, deaf/blind, and others such as severely hearing disabled or severely speech disabled which includes but is not limited to the creation of a telecommunications relay service to function as a communications bridge between members of the deaf and hearing citizenry;

The Commission in Order U-17656-B accepted RAB’s recommendation as to the choice of the initial contract provider of TRS and authorized the collection of an \$0.11 per month access line charge by telecommunications providers as an additional funding source for TRS, that is, to the extent that such funds were required in addition to the \$0.05 per month existing charge to provide intrastate TRS in compliance with the ADA. RAB initially received \$1,000,000 annually, and has in recent years received \$500,000.00 per year for TRS from the fund arising from the \$0.05 per month surcharge imposed by the Louisiana Legislature and controlled by the Louisiana Department of Social Services (the “LDSS”);



Due to RAB's wise and effective management of the funds it has received, to-wit: the \$500,000.00 payment from the LDSS (the primary source of intrastate TRS funding) and the \$0.11 per month access line charge collected by telecommunications providers pursuant to LPSC authority (the secondary source of intrastate TRS funding), RAB has accumulated approximately \$28,000,000.00 (the "Accumulated Fund") over and above RAB's current needs for the payment of the current contract provider of TRS and other appropriate or necessary RAB expenses and costs. At the request of members of the Commission, RAB was requested by members of the LPSC to study the use and appropriate investment of the Accumulated Fund as a future source of funding of intrastate TRS in lieu of the \$0.11 per month access line charge currently imposed on ratepayers in the State of Louisiana. In connection with this study, RAB obtained pertinent advice from the law firm of Liskow & Lewis and the investment firm of Merrill Lynch.

RAB has advised this Commission that it is critical for RAB to maintain its tax status as a non-profit entity to avoid the unnecessary payment of federal and state taxes on the earnings it obtains from the Accumulated Fund and other restrictions which would be imposed on RAB if its status changed from that of a charitable organization to a private foundation under the Internal Revenue Code. Also, it is essential for the maintenance of RAB as a non-profit entity under the Internal Revenue Code that RAB continue to obtain public funding through its receipt of \$500,000.00 per year under the control of the LDSS; and

Merrill Lynch has provided economic projections to RAB and the members of this Commission, including a Probability Analysis, showing that it is highly probable that, through the prudent investment of the Accumulated Fund and RAB's continued receipt of the \$500,000.00 per year, adequate TRS can be provided to the citizens of the State of Louisiana without the need of additional funding sources for at least fifteen (15) more years.

### **Conclusion**

RAB provided its resolution dated January 3, 2002 to the Commission calling for, among other things, adoption of a proposal to invest the Accumulated Fund and to substantially reduce or suspend the collection of the \$0.11 per month access line charge by telecommunications providers. After careful consideration of the RAB resolution, the Merrill Lynch projections and comments by Paul Guarisco on behalf of RAB and RAB counsel, the Commission decided to adopt all of the recommendations of RAB made in its resolution, except as described in this Order.

On motion of Vice Chairman Owen, seconded by Commissioner Dixon, and unanimously adopted, the Commission voted to adopt the recommendations of RAB with an amendment to eliminate the \$0.11 per month access line charge instead of substantially reducing or suspending the fee.

### **ACCORDINGLY, FOR THE REASONS ABOVE, IT IS ORDERED THAT:**

1. RAB is empowered and authorized to take all steps necessary or appropriate to create and organize a supporting organization ("SO") in the form of a Louisiana non-profit corporation, limited liability corporation or trust, as may be recommended by RAB's counsel and in a manner that will permit RAB to maintain its charitable organization status under the Internal Revenue Code. RAB shall obtain an appropriate IRS ruling or determination that the SO will be a tax-exempt organization.



2. RAB shall establish mechanisms for the governance of the SO to closely parallel the governance of RAB, and so that the members of RAB also will be, to the fullest extent possible, the governing members, officers, directors or trustees of the SO, with the overall condition that members of the SO, through RAB, are and remain subject and accountable to this Commission.

3. RAB is authorized to transfer to the SO the Accumulated Fund, less and except such amounts that RAB may determine are necessary as a reserve to cover existing and future expenses of RAB, whether anticipated or unanticipated.

4. RAB is authorized to amend or supplement its articles of incorporation, bylaws or any other governing documents so as to enable RAB to fully implement or effect any of the activities or transactions authorized by this Order.

5. The LPSC strongly encourages all appropriate parties, including without limitation the Louisiana Legislature, the LDSS and the Louisiana Commission for the Deaf, to support the continued payment of \$500,000.00 per year under the auspices of the LDSS to RAB so that RAB and the SO organization both may be able to maintain their charitable, non-profit status under the Internal Revenue Code.

6. RAB, through the SO, is authorized and directed to use funds generated by the SO, particularly from the investment income and corpus of the Accumulated Fund, to perform and provide all aspects of the charitable or non-profit functions of RAB, including the payment of the contract provider of TRS and the provision of TRS as may be otherwise required, as well as the other reasonable and appropriate expenses incurred by either the SO or RAB in connection with the oversight and provision of TRS.

7. RAB is authorized to seek and effect appropriate changes in its existing contract with the current contract provider of TRS, and in any Request for Proposals for future contract providers of TRS, so as to permit the payment of the contract provider's TRS charges by the SO and for any other appropriate purposes that are necessitated by the creation of the SO and its receipt of the Accumulated Fund.

8. RAB is authorized and directed to transfer from time to time to the SO any funds in the future possession of RAB and which RAB in its reasonable discretion determines are not needed for the payment of RAB's reasonable and appropriate expenses, so that such future funds are added to the Accumulated Fund for the benefit of the TRS program.

9. RAB is authorized and directed to cause, through the SO, and upon the advice of RAB's investment advisor, the investment of the Accumulated Fund and any additional funds received by the SO in the future, such that it is highly probable that adequate and efficient TRS can be provided to the citizens of the State of Louisiana for at least fifteen (15) more years without the necessity of any additional funding sources other than the \$500,000.00 per year received by RAB under the auspices of the LDSS.

10. Telecommunications providers shall eliminate, effective on or before billing periods beginning April 1, 2002, the collection of the \$0.11 per month access line charge from end users.

11. Telecommunications providers shall give notice of the elimination of the \$0.11 per month access line charge to end users via bill inserts.

12. RAB is authorized to take any other appropriate actions to cause or effect the full implementation of the activities and transactions described herein.

13. Upon request by any member of the Commission or Commission Staff, RAB shall report on the status of its progress in the implementation of the activities and transactions authorized or required by this Order. Once RAB has fully implemented all of those activities and transactions relating to the creation of the SO and the transfer of the Accumulated Fund from RAB to the SO, RAB shall make a final report to the members of this Commission and Commission Staff.

14. This Order shall not (i) diminish or restrict in any way the Commission's existing oversight of RAB or (ii) cause prior Order Nos. U-17656-A and U-17656-B or their effects to be superseded or modified except in the manner described in, or permitted by, this Order. In all respects, the Commission retains full authority over RAB and the SO and the composition and powers of those entities. The Commission may freely request information from RAB and the SO, and may add to, modify or define the duties and responsibilities of RAB and the SO. Members of RAB and the SO shall serve at the pleasure of the Commission until removed by it.

15. This Order is effective immediately.

**BY ORDER OF THE COMMISSION**  
**BATON ROUGE, LOUISIANA**  
February 26, 2002

/S/ JACK "JAY" A. BLOSSMAN  
DISTRICT I  
CHAIRMAN JACK "JAY" A. BLOSSMAN

/S/ DON OWEN  
DISTRICT V  
VICE-CHAIRMAN DON OWEN

/S/ IRMA MUSE DIXON  
DISTRICT III  
COMMISSIONER IRMA MUSE DIXON

/S/ C. DALE SITTIG  
DISTRICT IV  
COMMISSIONER C. DALE SITTIG

LAWRENCE C. ST. BLANC  
SECRETARY

/S/ JAMES M. FIELD  
DISTRICT II  
COMMISSIONER JAMES M. FIELD

**BY ORDER OF THE COMMISSION  
BATON ROUGE, LOUISIANA**

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DISTRICT I  
CHAIRMAN JACK “JAY” A. BLOSSMAN

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DISTRICT V  
VICE-CHAIRMAN DON OWEN

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---

LAWRENCE C. ST. BLANC  
SECRETARY

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DISTRICT II  
COMMISSIONER JAMES M. FIELD